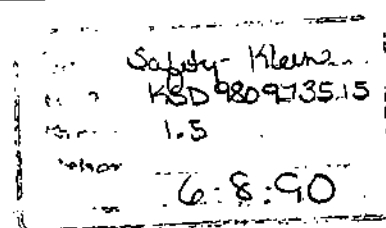


Final Report  
Environmental Priorities Initiative  
Preliminary Assessment  
Safety-Kleen Corporation  
Edwardsville, Kansas  
TDD #F-07-9002-003 PAN #FKS0284RA  
Site #S03 Project #001  
Prepared by: E & E/FIT for Region VII RPO  
FIT Task Leader: Jim Fick  
RCRA-EPI Contact: Eugene Evans  
Date: June 8, 1990



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**PREP SECTION**

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SUPERFUND RECORDS

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## SECTION 1: INTRODUCTION

As part of the U.S. Environmental Protection Agency (EPA) Environmental Priorities Initiative (EPI) program, EPA has requested Ecology and Environment, Inc., Field Investigation Team (E & E/FIT) to conduct an EPI Preliminary Assessment (PA) of Safety Kleen, located at 9317 Woodend Road, Edwardsville, Kansas 66111.

The EPI program integrates the Resource Conservation and Recovery Act of 1976 (RCRA), the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), and the Superfund Amendments and Reauthorization Act of 1986 (SARA) in order to set priorities for cleanup of the most environmentally significant sites first. This EPI PA is essentially equivalent to RCRA's Preliminary Review/Visual Site Inspection (PR/VSI) and identifies potential or actual releases at the facility and determines if remedial measures are necessary.

This report discusses information obtained from EPA-RCRA, Safety-Kleen, and the Kansas Department of Health and Environment (KDHE). All solid waste management units (SWMUs) are described in detail. Observations made during the on-site reconnaissance conducted by E & E/FIT on March 8, 1990, are also included. Photographic documentation is included as Appendix A. EPA Preliminary Assessment Form 2070-12 is included as Appendix B.

## SECTION 2: SITE LOCATIONS AND DESCRIPTION

### 2.1 SITE LOCATION

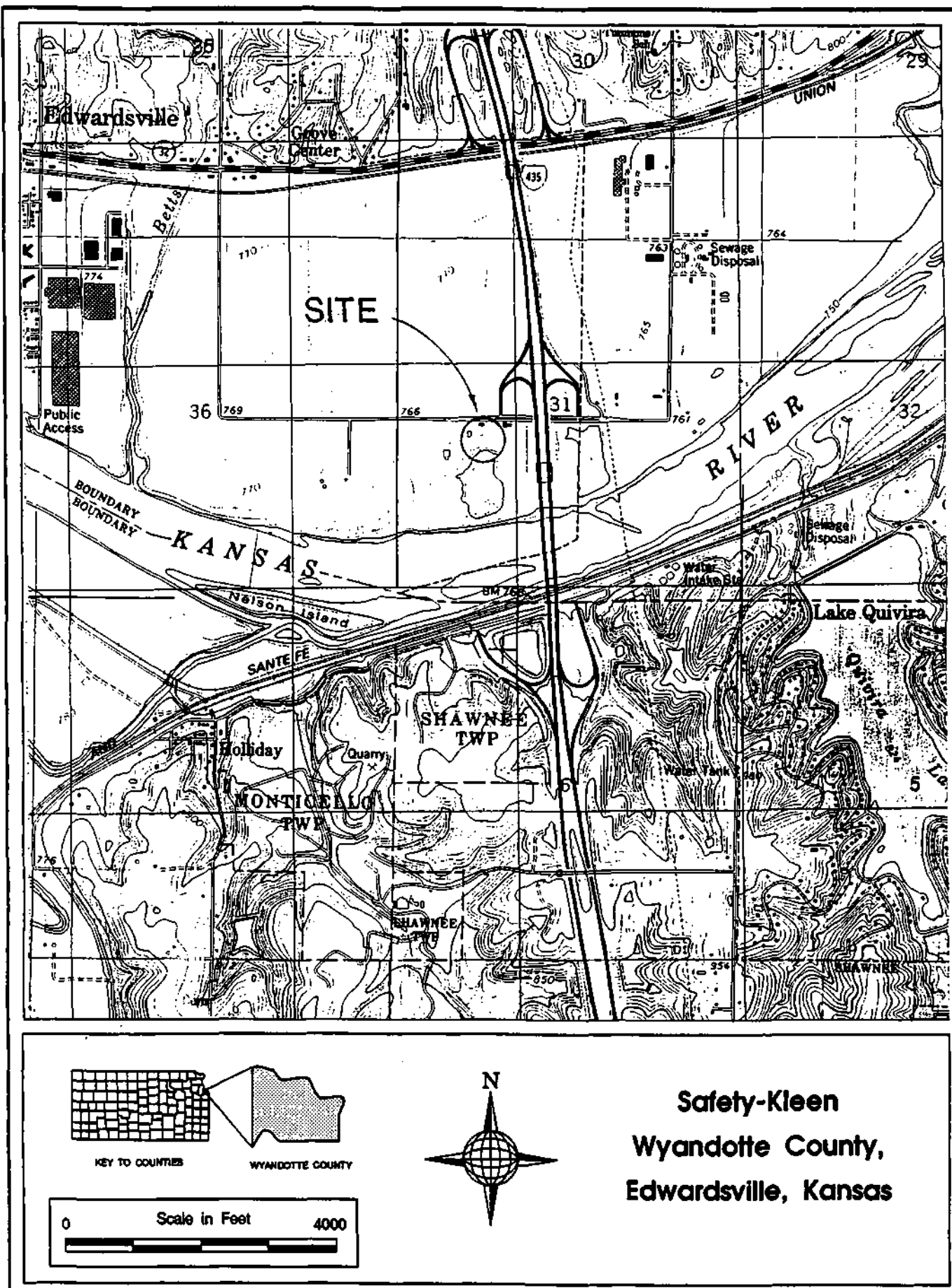
The Safety-Kleen site is located in the southwest 1/4 of Section 31, Township 11 South, Range 24 East. The geographic coordinates are 39° 03' 00" N latitude and 94° 47' 30" W longitude. The site is situated on Woodend Road approximately one-third mile west of Interstate Highway 435, west of Kansas City, Kansas, in Wyandotte County (Figure 2-1) (USGS 1984).

### 2.2 SITE DESCRIPTION

The Safety-Kleen facility is an accumulation and storage point for spent solvents from off-site immersion cleaners (I.C.) and other industrial processes requiring solvents. This solvent waste stream consists primarily of spent mineral spirits, tank bottom sludge, dumpster sludge, spent immersion cleaner solvents, and paint thinner waste. The spent solvents are generated by Safety-Kleen customers, the majority being small quantity generators. The tank bottom sludges and the dumpster sludges are generated on site by Safety-Kleen.

The facility utilizes a "closed loop" system for solvent handling. This system is structured as follows: the spent solvents are collected from Safety-Kleen customers and delivered to the Safety-Kleen facility where they are placed in an engineered storage area. Biweekly these stored drums are transported to a recycling center located in Elgin, Illinois. At this time, recycled solvents are delivered to the facility for later delivery to Safety-Kleen customers. The unique feature of this system is that Safety-Kleen retains ownership of the solvent. The "closed loop" system allows the company to maintain control of the solvent except while it is in use at the customer's place of business (Safety-Kleen 1987). Figure 2-2 shows the "closed loop" system for solvent use and regeneration.

Materials such as dumpster sludge and tank bottom sludges are not included in the "closed loop" system. Rather, these materials are stored on site until sufficient quantity is accumulated to allow



Prepared by Lee Robertson  
Ecology & Environment/FIT April 1990

Waste Site Tracking #: KS0284  
Source: USGS 7.5' Topo, Edwardsville, KS 1984

Figure 2-1: SITE LOCATION

## Safety-Kleen Solvent Use & Regeneration Loop

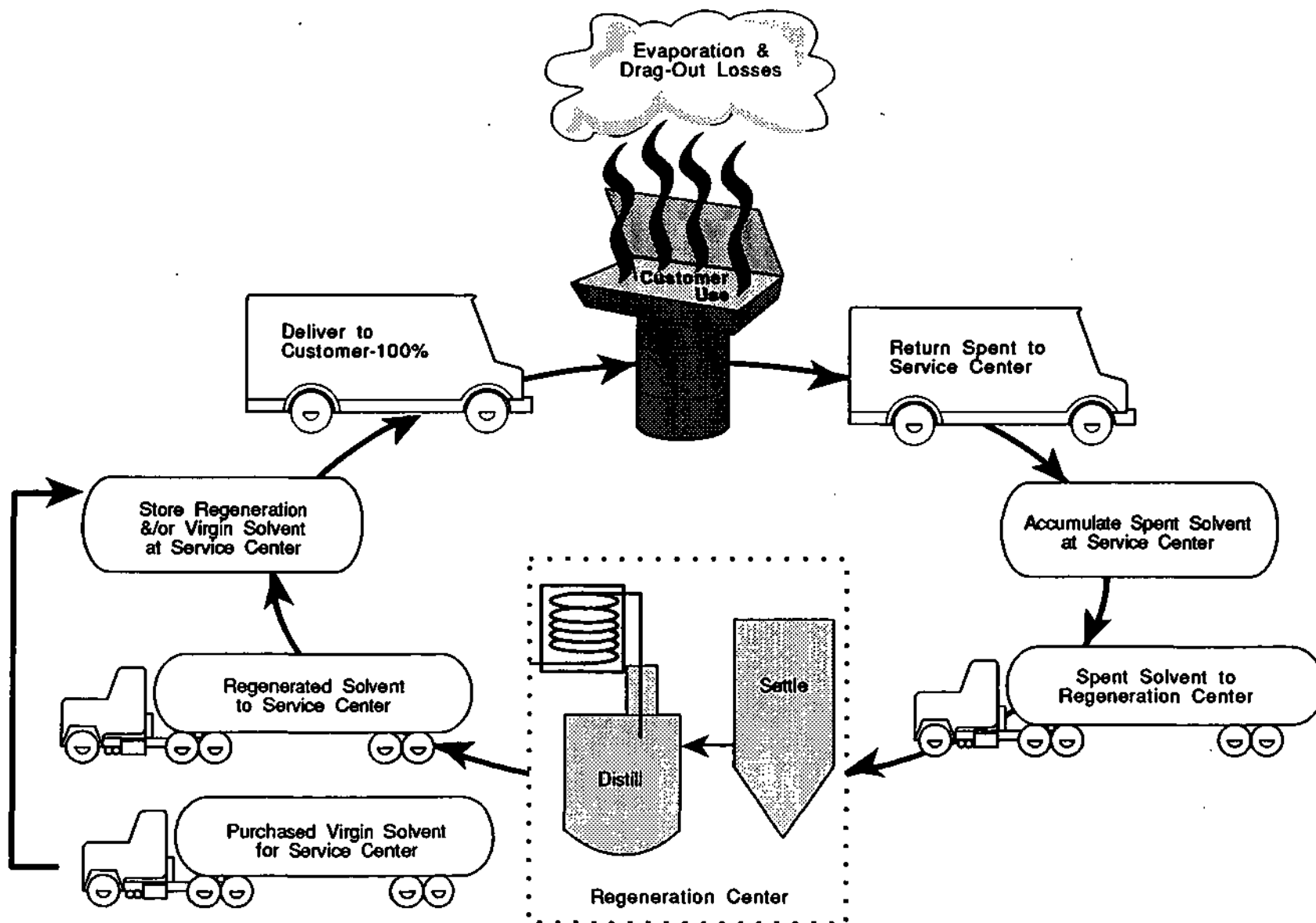


Figure 2-2

2-3

economic off-site disposal. This off-site disposal consists primarily of incineration.

The facility encompasses 1.38 acres and consists of several structures which are as follows:

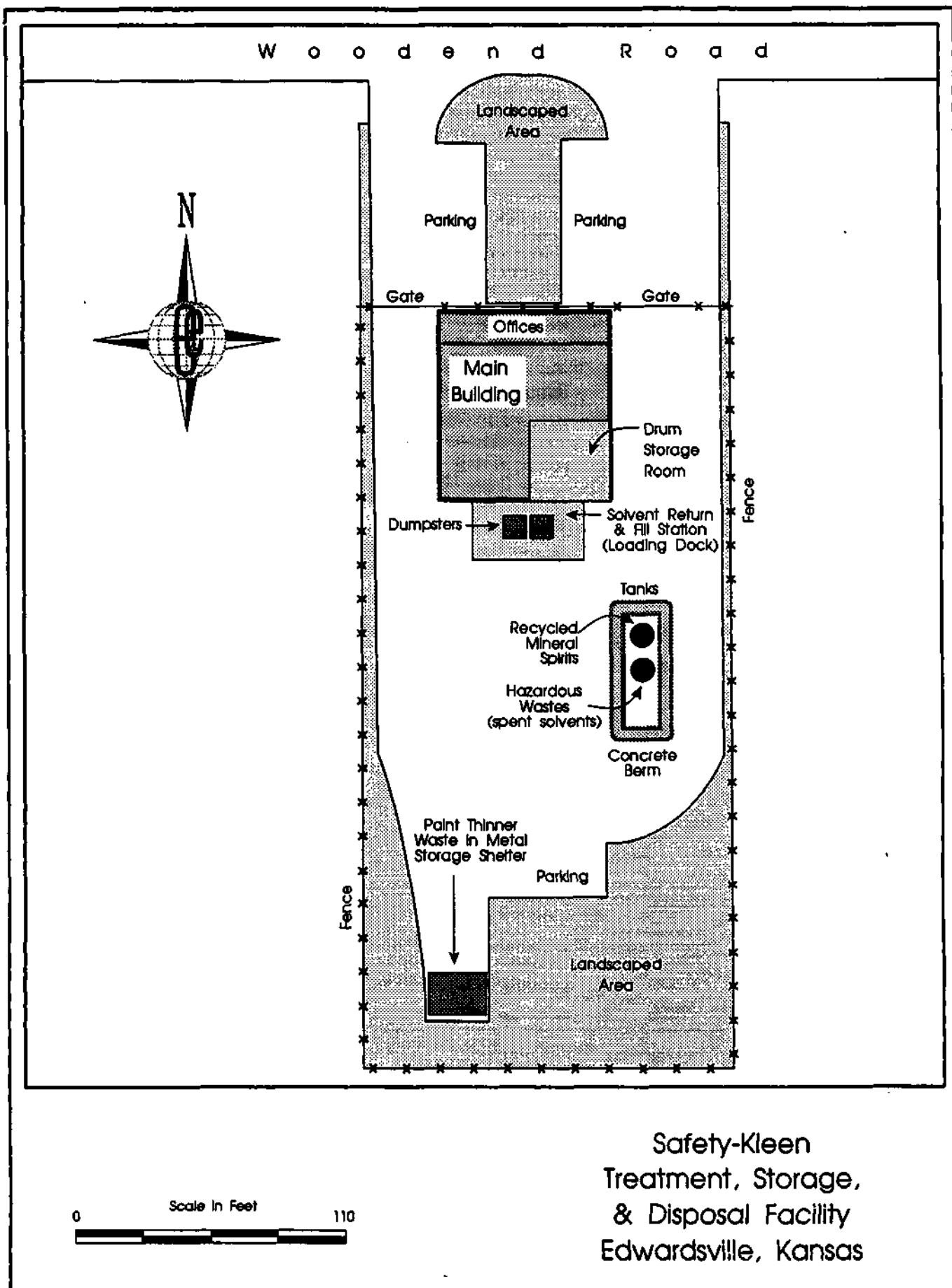
- a) a 5,600-square-foot warehouse housing general offices and a contained drum storage area;
- b) two 15,000-gallon aboveground storage tanks, with containment diking, for recycled and spent solvent;
- c) a solvent return and fill station with a loading dock, two dumpsters, and containment diking;
- d) an enclosed metal storage shelter for containerized paint thinner wastes (flammable).
- e) an aboveground piping (delivery/return) system between b and c above.

The work areas outside the facility buildings are paved with concrete or covered by gravel. The majority of the traffic and loading/unloading operations occur at the return and fill station. This area is paved with concrete. The entrance to the facility is on Woodend Road, the main access road to the facility (Figure 2-3). Access and internal roads at the service center are designed to bear 40,000 pounds per axle. The total weight of a Safety-Kleen tanker truck as determined by Safety-Kleen's Fleet Department, is 80,000 pounds when full of solvent.

The facility is secured with a six-foot-high chain link fence topped with three strands of barbed wire. All access gates are locked when the facility is unoccupied. Warning signs stating "DANGER - Unauthorized Personnel Keep Out" are posted at the entrances. All areas containing hazardous materials were properly marked with signage visible from a considerable distance. When the gates are unlocked, the service center personnel monitor entry and exit from the facility. Outdoor lighting remains on 24 hours a day.

The office/warehouse building is secured with locks on all doors. Warning signs are posted at all entrances to the waste storage areas and on all sides of the building. The tanks are accessible within the fenced area. Access to the stored materials in these tanks is restricted. Materials are moved into and out of the tanks through pumps and or





Prepared by Lee Robertson  
Ecology & Environment/FIT April 1990

Waste Site Tracking #KS0284  
Source: Safety-Kleen Corp. 1987

Figure 2-3: SITE MAP WITH SWMU LOCATIONS

aboveground piping system. The pump controls are located inside the warehouse. The pumps are not activated unless mineral spirits product or wastes is being added to or removed from the tanks by Safety-Kleen personnel. Warning signs are posted at the return and fill station.

The paint waste shelter door is always closed and locked unless containers are being added to or removed from the shelter. Warning signs are also posted on the shelter.

### 2.3 SITE CONTACTS

Persons familiar with operations or who have regulatory involvement with the Safety-Kleen facility include:

1. Mike Zytka  
Branch Manager  
Safety-Kleen Corp.  
9317 Woodend Road  
Edwardsville, Kansas 66111  
(913) 422-5222
2. Joel Zimmerman  
Regional Manager (St. Louis Region)  
Safety-Kleen Corp.  
93 Harvest Drive  
St. Charles, Missouri 63303  
(314) 441-0081 or 1-800-669-5840 ext. 5606
3. Jeff Simpson  
Environmental Engineer  
Safety-Kleen Corp.  
777 Big Timber Road  
Elgin, Illinois 60123  
312-697-8460;
4. Eugene Evans  
U.S. Environmental Protection Agency  
Environmental Scientist  
RCRA Branch/Waste Management Division  
726 Minnesota Avenue  
Kansas City, Kansas 66101  
(913) 551-7731
5. James R. Fick  
Ecology and Environment, Inc.  
Environmental Geophysicist  
6405 Metcalf, Suite 404  
Overland Park, Kansas 66202  
(913) 432-9961.

## **SECTION 3: SITE BACKGROUND**

### **3.1 GENERAL HISTORY AND WASTE HANDLING PRACTICES**

Safety-Kleen Corp. is located at 9317 Woodend Road, Edwardsville, Kansas. The Safety-Kleen Corporate Headquarters is located at 777 Big Timber Road, Elgin, Illinois 60123. Operations at the Edwardsville facility began April 11, 1985, and the facility is still active as of the date of this report.

The site is zoned for industrial use. No easements or title/deed restrictions were discovered during this EPI PA. The facility is an accumulation and storage point for spent solvents generated by Safety-Kleen customers. The service center has the equipment necessary for employees to safely manage all on-site wastes. All wastes are ultimately shipped to separate Safety-Kleen recycling facilities in Elgin and Dolton, Illinois, or Denton, Texas. It is a Safety-Kleen policy to use only recycling facilities which are properly permitted, either under interim status or a Part B permit. Routine inspections of the storage areas are performed at the facility. The Branch Manager or his alternate is responsible for carrying out and documenting the facility inspection on a daily basis (Appendix C). Inspection reports are kept on file in the Branch Manager's office.

The Regional Manager, who supervises several Branch Managers, inspects the facility, and reviews the facility inspection reports on a quarterly basis to insure proper completeness and to verify the completion of any necessary repairs. The facility inspection involves the following structures: storage tanks, solvent dispensing equipment, drum storage areas, solvent transport vehicles, dumpsters, safety equipment, and security systems.

### **3.2 PERMIT AND REGULATORY ACTION SUMMARY**

Following is a chronological listing of the compliance history of Safety-Kleen Corp. in Edwardsville, Kansas.

April 11, 1985	Safety-Kleen began operations at the facility in Edwardsville, Kansas, under EPA I.D. #KSD980973515.
----------------	--

June 27, 1985	EPA/RCRA receives Safety-Kleen's notification of Hazardous Waste Activity Form.
August 22, 1985	EPA/RCRA acknowledges receipt of Safety-Kleen Part A of Hazardous Waste Permit Application.
October 8, 1985	KDHE acknowledges Notification of Hazardous Waste Activity Form was filed June 21, 1985.
September 10, 1986	KDHE informs Safety-Kleen that the Hazardous Waste Compliance Inspection conducted on August 8, 1986, indicated several items concerning generators and transporters of hazardous wastes, were not in compliance with state/federal regulations. This storage facility is subject to the requirements of 40 CFR; Part 260 to 262, 265, 270, and 124. This facility is registered as a hazardous waste transporter and is subject to requirements of 40 CFR, Part 263.
September 30, 1986	KDHE requests six copies of Safety-Kleen Part B application, under RCRA authority.
November 4, 1986	Safety-Kleen was assessed and ordered to pay an administrative penalty for violations of Kansas Administrative Regulations (K.A.R.) 28-31-8. These violations were for lack of proper security and warning signs, insufficient personnel training, failure to conduct inspections, lack of access to emergency communications, and a lack of an emergency coordinator on call at all times.
March 2, 1987	KDHE sent letter of warning after completing initial review of Part B Permit application of which several sections were found to be deficient and needed correction.
March 16, 1987	KDHE confirms receipt of photographs for Part A application.
April 4, 1987	An administrative order was issued with a financial penalty for violation of the Kansas Statute annotate (K.S.A.) 65-3441, K.A.R. 28-31-4, and K.A.R. 28-31-8. Violations included the lack of a detailed chemical and physical analysis of paint waste thinner, improper labeling of waste containers, the words "Hazardous Waste" and the accumulation start date were not marked on all hazardous waste containers, failure to conduct inspections on monitoring equipment, no placards for transport vehicles were available, and several drums of waste were found open.

September 28, 1987 KDHE sent letter of warning after completing second review of the Part B Permit application of which several sections were found to need additional information and/or correction.

October 5, 1987 KDHE sent an addendum to the letter of warning issued to Safety-Kleen on September 28, 1987. Two additional discrepancies were found and noted during a September 30, 1987, walk-through of the facility by two KDHE staff members.

November 19, 1987 KDHE sent copy of variance request number 87-02 to EPA regarding the Safety-Kleen TSD facility. The request was for a variance from the requirements of 40 CFR 265.176 which requires storage of ignitable hazardous waste greater than 50 feet from the property line.

February 2, 1988 KDHE conducts compliance inspection.

February 4, 1988 KDHE approves the variance regarding K.A.R. 28-31-13(b), effective February 18, 1988.

March 7, 1988 KDHE informs Safety-Kleen that the hazardous waste compliance inspection conducted on February 2, 1988, indicated several items not in compliance with state and federal regulations. The facility has interim status as a storage facility and is subject to the requirements of 40 CFR, Part 260, 262, 265, and 125. The facility is a registered hazardous waste transporter and subject to the requirements of 40 CFR, Part 263.

February 2-3, 1989 KDHE conducts compliance inspection.

March 30, 1989 Safety-Kleen responds to KDHE's February 27, 1989, letter concerning the February 2 and 3, 1989, inspection. Safety-Kleen intends to take corrective action for inspection deficiencies.

## **SECTION 4: ENVIRONMENTAL SETTING**

### **4.1 CULTURAL AND ENVIRONMENTAL SETTING**

The facility is located adjacent to the Kansas River in a small area zoned for industrial use. The population within a 1-mile and 4-mile radius of the site is approximately 230 and 8,600 people, respectively (USDA 1977). The nearest single-family dwelling is 1/4 mile east of the site. The nearest recreational area, the Kansas River, is 1/3 mile south of the facility. No parks or schools are known to exist within a one-mile radius of the facility (USGS 1984).

The climate in Wyandotte County is characterized by warm to hot summers and cold winters. The average yearly precipitation of the area is 35 inches of which about 70 percent falls during April through September (USDA 1977). Net precipitation for the area is 10 inches (EPA 1988).

Current information indicates that the Bald Eagle and Peregrine Falcon are the only endangered species located within a 4-mile radius of the facility (Gilliland 1990; Lekie 1990). No known sensitive environments exist within a 1-mile radius of the facility.

### **4.2 TOPOGRAPHY AND DRAINAGE**

Edwardsville, Kansas, is in a glaciated region. The site is located on the 500-year floodplain of the Kansas River. The Kansas River Valley is slightly more than one mile wide and is bounded by steep slopes and breaks caused by the differential erosion of limestone, shale, and sandstone along the river and its tributaries (USDA 1977). Overland flow onto or from the site is not controlled. Runoff will tend to migrate south towards the Kansas River. A flood levee prevents runoff from directly entering the river. The facility has an elevation of 765 feet above sea level.

A septic tank handles sanitary wastes from the facility. It is located in the north part of the property. Potable water is provided to the facility by the Kansas City Board of Public Utilities. A six-inch

water main on Woodend Road supplies the facility with water. No sanitary or storm sewer lines exist on Woodend Road.

#### 4.3 SOILS

The Edwardsville facility is located on the Eudora soil series (USDA 1977). The Eudora series is classified as a coarse-silty, mixed mesic Fluentic Hapludoll. The Eudora soils are nearly level and well-drained. These soils are generally located on the high bottomland along the Kansas River. Soils in the Eudora series are neutral to moderately alkaline and are formed in silty alluvium. The soils are dark grayish-brown in color and range from fine, sandy loam to silt loam. They have a high available water capacity and moderate permeability (USDA 1977).

#### 4.4 STRATIGRAPHY

The bedrock formations found in Wyandotte County include the Pleasanton Group and the Kansas City Group which are of Pennsylvanian age (Figure 4-1). Alluvial deposits intersect the bedrock formations with an estimated 75- to 100-foot thickness (Gentile 1990). A generalized section of rocks both exposed and underlain in Wyandotte County is listed in Table 4-1 (Jewett and Newell 1935).

The first bedrock encountered below the Safety-Kleen site is likely the Winterset Member (Dennis Formation) of the Bronson subgroup. The Bronson subgroup is the lower part of the Kansas City Group and consists of five formations, which are, in descending order: Dennis, Galesburg, Swope, Ladore, and Hertha. The Bethany Falls and Winterset limestone members of the Swope and Dennis formations, respectively, are the most prominent lithologic units in the subgroup (MGS 1961). The Bronson is about 60 to 80 feet thick. The Kansas City Group is a very low yielding aquifer.

Below the Kansas City Group lies the Pleasanton Group, which generally consists of undifferentiated argillaceous to sandy, micaceous shale and sandstone; thin siltstones may be present in the upper part of the group. The average thickness of the Pleasanton Group is approximately 75 to 100 feet. The Pleasanton Group is considered to be the basal aquitard for the limestones of the Kansas City Group.

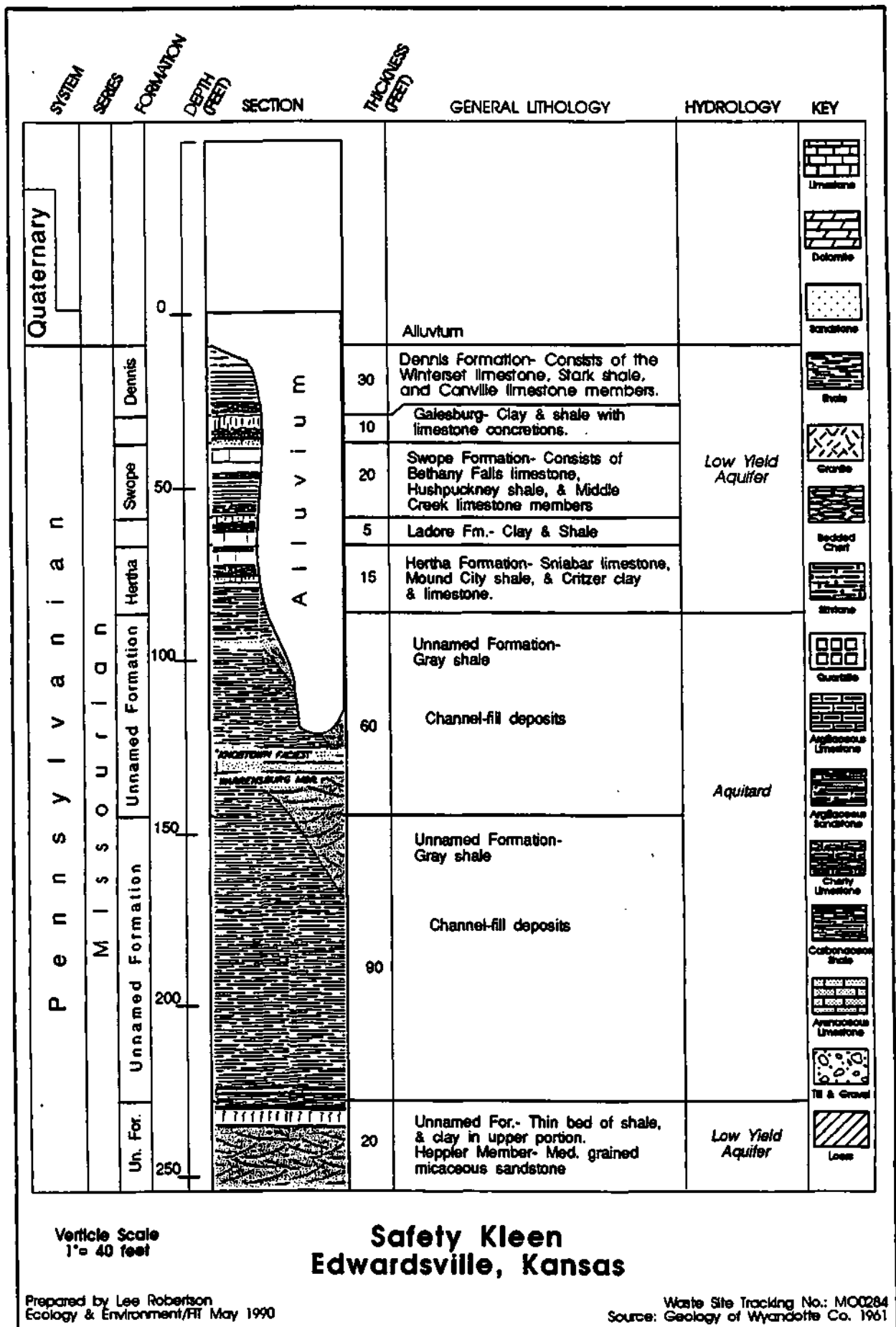


Figure 4-1: GENERALIZED STRATIGRAPHIC COLUMN



Table 4-1  
Geology of Wyandotte County, Kansas  
(Jewett and Newell 1935)

Quaternary System:	Thickness in feet
Recent Series:	
Alluvium; stream deposits of sand, silt, clay in valley bottoms	0-100
Colluvium,; fragmental talus deposits, humic soil.....	0-15
Residual soil; humic soil, clay.....	0-5
Recent and Pleistocene Series:	
Loess, fine, locally arenaceous, clayey, buff to red, wind-blown material.....	0-50
Pleistocene Series:	
Kansas drift:	
Glacial erratics, worn local boulders, sand, gravel.....	0-8
Unconformity.	
<b>Pennsylvanian system:</b>	
Virgil Series:	
Douglas Group:	
Stranger Formation:	
Sandstone and shale, massive, soft, micaceous, fine-grained sandstone, some arenaceous shale, generally with a limestone conglomerate at base.....	30±
Unconformity.	
Missouri Series:	
Lansing Group:	
Stanton limestone:	
Little Kaw limestone member:	
Limestone, generally massive, gray, buff, or blue.....	3±
Victory Junction shale member:	
Shale, arenaceous and argillaceous, gray or brown.....	7±
Olathe limestone member:	
Limestone, wavy- and thin-bedded, crystalline, gray to dark.....	12±
Eudora shale member:	
Shale, gray or buff with black, slaty, middle zone.....	6±
Captain Creek limestone member:	
Limestone, fine-grained, dark, massive.....	5.5
Vilas shale:	
Shale, arenaceous, buff to gray with layer of calcereous, rippled sandstone near top.....	24±
Plattsburg limestone:	
Spring Hill limestone member:	
Limestone, brown to yellow, soft argillaceous.....	14±
Hickory Creek shale member:	
Shale, yellowish-brown with a thin layer of black shale	0.5±
Merriam limestone member:	
Limestone, massive, gray, hard, even-bedded, lower part with abundance of Osagia and Myalina.....	3±

Table 4-1 (cont.)

## Kansas City Group:

## Bonner Springs shale:

Shale, arenaceous, gray to buff, with fossil plants; near top argillaceous, and green with red zones and limestone nodules..... 25±

## Wyandotte limestone:

## Farley limestone member:

Limestone, massive, dark, even-bedded..... 5-10

Shale, buff, limy, gray, locally with an abundance of *Myalina subquadrata*..... 0-5

Limestone, massive, cross-bedded, fossiliferous, argillaceous and thin-bedded below..... 10-28

## Island Creek shale member:

Shale, argillaceous, bluish-gray..... 1-40

## Argentine limestone member:

Limestone, thin-bedded, whitish gray, cherty, buff and shaly below..... 25±

## Quindaro shale member:

Shale, buff, limy..... 1±

## Frisbie limestone member:

Limestone, bluish, blocky, even-bedded..... 2±

## Lane shale:

Shale, argillaceous, bluish-gray to buff..... 25±

## Iola limestone:

## Raytown limestone member:

Limestone, even-bedded, massive, dark-gray..... 6

## Muncie Creek shale member:

Shale, argillaceous, buff, with platy, carbonaceous layer at the middle..... 3

## Paola limestone member:

Limestone, bluish-gray, dense, even-bedded..... 1

## Chanute shale:

Shale, argillaceous, dark-gray, maroon layer near middle.. 12±

## Drum limestone:

Limestone, thin-bedded, light-gray, locally, cherty..... 10±

## Quivira shale:

Shale, argillaceous, green to gray, carbonaceous near the middle..... 5±

## Westerville limestone:

Limestone, drab, brown at top, upper layer of brown chert, locally underlain by oolite, or oolitic throughout, or hard, gray oolitic limestone ..... 14±

## Wea shale:

Shale, argillaceous buff..... 10±

## Block limestone:

Limestone, thin with interbedded buff, calcareous shale. 6±

## Fontana shale:

Shale, buff, limy shale..... 3±

Table 4-1 (cont.)

Bronson Subgroup:

Dennis limestone:

Winterset limestone member:

Limestone, argillaceous, drab to blue, soft, with black  
chert in upper part, thin, platy shale near the  
middle part, dark gray, hard and massive below..... 30±

Stark shale member:

Shale, buff above and black below..... 3±

Galesburg shale:

Shale, gray to buff, argillaceous..... 6±

Swope limestone:

Bethany Falls limestone member:

Limestone, upper part nodular, drab to gray, weathers  
into small fragments, lower part massive, gray and  
hard..... 24±

#### 4.5 GROUND WATER

The Safety-Kleen site is located on the alluvial deposits of the Kansas City Valley. The Kansas River and the alluvial aquifer systems are the principal sources of water for the municipal, industrial, and irrigation supplies along the Kansas River Valley (USGS 1974).

The recent alluvial deposits yield the largest supplies of ground water in the area compared to the Pennsylvanian bedrock aquifer which is intersected by the Kansas River alluvium. The Pennsylvanian aquifer produces water of low quantity and poor quality since the aquifer consists chiefly of limestone and shales, together with a small amount of fine-grained sandstone (E & E/FIT 1989).

Municipal water for the city of Edwardsville, Kansas, and the immediate surrounding area is provided by the Board of Public Utilities (BPU) at the Quindaro Water Treatment Plant located at 3601 North 21st, Kansas City, Kansas 66104 (Gray 1990). A Kansas River intake, located on the south of the Kansas River at 8800 Holiday Drive, Holliday, Kansas, is hydraulically downgradient, and 1/2 mile southeast of the site. The surface water intake and 21 alluvial wells located approximately 1 1/4 miles downriver of the intake, serve an estimated 240,000 residents in Johnson County (USGS 1984).

## **SECTION 5: DESCRIPTION OF INDIVIDUAL SOLID WASTE MANAGEMENT UNITS**

### **5.1 WAREHOUSE DRUM STORAGE AREA**

#### **5.1.1 Information Summary**

##### **Unit Description**

The warehouse drum storage area is located inside the warehouse at the southeast corner of the main building (Figure 2-3). The room is 32 feet X 32 feet with a monolithically poured concrete floor. All 16-gallon drummed wastes, which are brought in from Safety-Kleen customers, are initially stored in this area before they are transported off site to a regeneration center. See Appendix A, Photograph #1 for an illustration of the warehouse drum storage area. This is a RCRA-regulated SWMU. The structure appears to be in good condition with no apparent abnormalities. The entire unit is inspected daily by the Branch Manager, or his alternate; inspections are made quarterly by the Regional Manager.

##### **Date of Start Up**

April 11, 1985

##### **Date of Closure**

Active

##### **Waste Managed**

Drums are stored on wooden pallets along the walls of the warehouse drum storage area. A two-foot aisle space is maintained between all pallets and the drums are stored no more than two pallets high. The pallets are moved with a fork-lift or a hand hydraulic pallet jack. All containers holding hazardous wastes are closed except when adding or removing waste. Any spilled or leaked waste is removed from the secondary containment area immediately after it is released.

## Unit Process for the Handling of Spent Solvents and Paint Waste

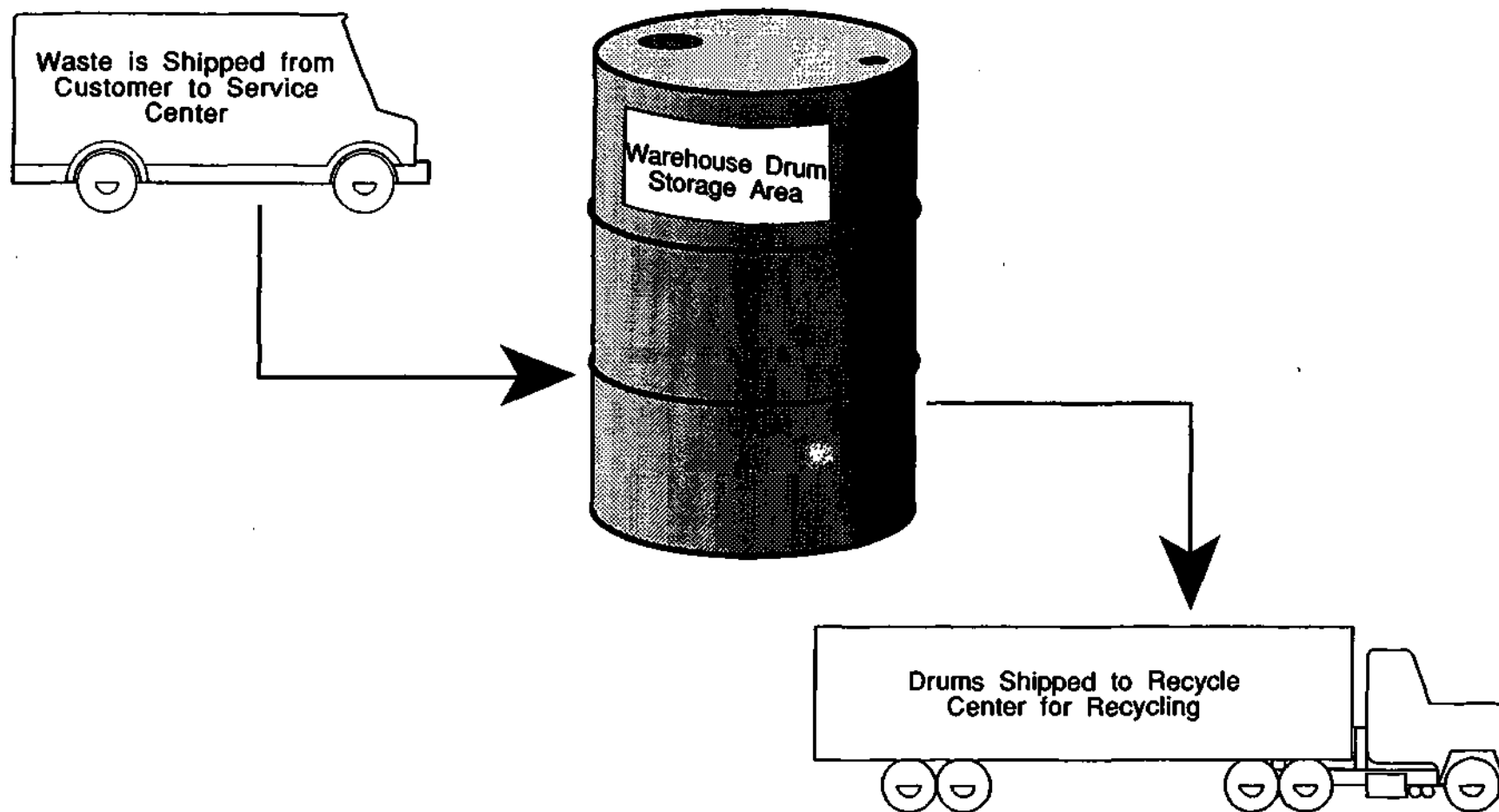


Figure 5-1  
5-2

The warehouse drum storage area is used for the storage of tank bottom and dumpster sludge which is ignitable (D001) and E.P. Toxic for cadmium, chromium, and lead (D006, D007, and D008), and for spent solvents, primarily from immersion cleaner which contains chlorinated solvents (F002) and cresylic acid (F004). The facility infrequently handles dry cleaning waste comprised mainly of perchloroethylene (F002) and lesser amounts of mineral spirits (D001) and trichloro-trifluoroethane (F002). The dumpster sludge is produced during the cleaning of the dumpsters located at the return/fill station area. The tank bottom sludges are produced during the cleaning of the aboveground storage tanks. The sludges are contained in 16-gallon, red color-coded drums and the spent solvents are contained in 16-gallon, black color-coded drums. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes. Figure 5-1 shows the process for the handling of spent immersion cleaner to the recycling center. No more than 4,000 gallons of wastes are stored in the drum storage area at any given time (Safety-Kleen 1987).

#### **Release Controls**

The warehouse drum storage area has secondary containment in the form of a monolithic concrete pad bounded by a 6-inch-wide by 4-inch-high steel reinforced concrete curb. No cracks or breaks in this containment were observed at the time of the VSI. Inside this containment area are two 8-foot X 2-foot X 20-inches (200 gallon capacity each) collection trenches, poured as part of the monolithic pad. The trenches increase the maximum holding capacity of this containment structure (Safety-Kleen 1987). The primary release potential for this SWMU would be air releases emanating from ruptured drums or improper sealing of drums.

#### **History of Releases**

Available file information provided no documentation or indication of releases from this unit. During the VSI, volatile organic compounds were detected with the HNu instrument which read 3 parts per million (ppm) benzene equivalents. The storage room has a ventilation fan located in the southeastern corner of the building. No filters are

known to exist; therefore, any release is delivered to the outside air. Drummed wastes were neatly staged and containers were in fair to good condition.

#### **5.1.2 Further Information Needs**

None noted at this time.

### **5.2 ABOVEGROUND STORAGE TANKS**

#### **5.2.1 Information Summary**

##### **Unit Description**

There are two aboveground storage tanks: the northern tank contains recycled mineral spirits; the southern tank contains spent mineral spirits (Appendix A, Photograph #3). The locations of the two storage tanks are shown on Figure 2-3. The spent solvents from parts washers are accumulated in a 15,000-gallon aboveground storage tank via the return and fill station dumpster and aboveground piping system. The aboveground tanks have been designed in accordance with NFPA Standard 142 and are constructed of carbon steel. These tanks are painted white to increase their albedo (Safety-Kleen 1987). The aboveground piping which carries the solvents from the dumpsters to the tanks are 2-inch galvanized steel pipe painted bright orange and brown. The pipe is all one unit with no fittings and is welded at both ends to the respective tanks and dumpsters (Zytka 1990). At the time of this VSI the tanks and pipes appeared to be in good condition; no dents or rusted areas were noted.

##### **Date of Start Up**

April 11, 1985

##### **Date of Closure**

Active

##### **Wastes Managed**

The dumpster empties into the tank via an aboveground piping



system. This waste handling method results in the following two types of mineral spirits waste:

- 1) Spent mineral spirits solvent - the spent mineral spirits solvent is removed from the tank by a tanker truck on a scheduled basis. About 6,000 to 7,000 gallons are removed weekly. This waste is classified as ignitable (D001) and E.P. toxic for cadmium, chromium, and lead (D006, D007, and D008).
- 2) Tank bottom sludge - about once every two years it is necessary to remove sediment and other viscous material from the bottom of the tank. A Safety-Kleen vacuum tank is used to remove this sludge from the tank. This sludge exhibits the same hazardous waste characteristics as the spent mineral spirits solvent (Safety-Kleen 1987). This material is then drummed and stored in the warehouse storage area or immediately shipped to a disposal facility.

### **Release Controls**

The secondary containment structure for these tanks is a steel reinforced monolithic concrete slab with curbing measuring 50 feet X 20 feet X 3 feet. The containment volume, taking into account tank displacement, is 18,554 gallons. Each tank is equipped with an audio-visual high level alarm (Safety-Kleen 1987). External inspections are performed daily by Safety-Kleen personnel to insure that no leaks or spills have occurred from either the tanks or the pipes (Zytka 1990). The tanks are elevated allowing visual inspection of the tank bottoms. Ground contamination is the release of concern due to the piping system. Any breakage or cracks in the pipes would cause ground contamination and in turn could cause possible ground water contamination through leaching. Significant ground water contamination could lead to ground water to surface water release.

### **History of Releases**

Available file information provided no documentation or indication of releases from this unit. Observations made during the VSI provided no indications of any releases from the aboveground storage tanks and piping system. Liquid noted in Photograph #4 (Appendix A) inside the containment area is water due to a recent rain.

handling of the spent mineral spirits to the recycling center. This SWMU is also a dispensing point for recycled solvents from one of the 15,000-gallon storage tanks. The RCRA hazardous waste classification of this sludge is ignitable (D001), F002, F004, and E.P. toxic for cadmium, chromium, and lead (D006, D007, and D008). F002 and F004 wastes contain chlorinated solvents and cresylic acid, respectively (Safety-Kleen 1987).

#### **Release Controls**

The Return and Fill Station has secondary containment in the form of a monolithic 40-foot X 30-foot X 6-inch (4,488 gallon capacity) concrete slab and curb structure. The dumpsters are inspected daily for any spills or leaks by Safety-Kleen personnel (Safety-Kleen 1987). The major release concern posed by the dumpsters would be an air release of volatile organic compounds.

#### **History of Releases**

Available file information provided no documentation or indication of releases from this unit. Observations made during the VSI provided no indication of any releases from the dumpsters in the return and fill area. No liquid was noted in the containment area.

#### **5.3.2 Further Information Needs**

None noted at this time.

### **5.4 PAINT WASTE METAL STORAGE SHELTER**

#### **5.4.1 Information Summary**

##### **Unit Description**

The Paint Waste Storage Shelter is located in the southwestern section of the facility (Figure 2-3). The shelter is constructed of sheet aluminum and has the following dimensions: 15 feet X 25 feet. See Appendix A, Photographs #4 and #5 for an illustration of this building. The structure appears to be in good condition with no apparent abnormalities.

## Unit Process for the Handling of Spent Mineral Spirits

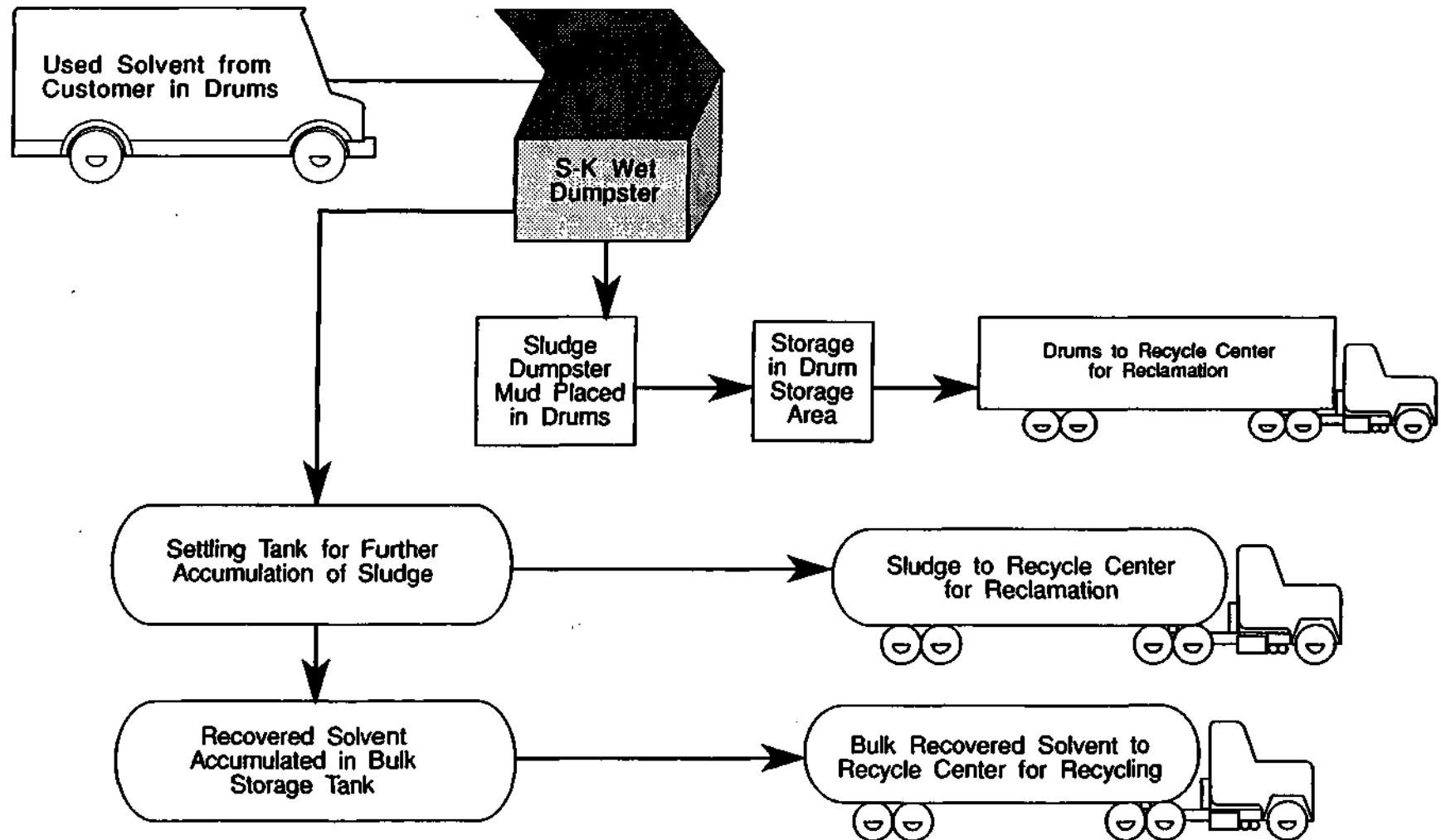


Figure 5-2  
5-7

### **5.2.2 Further Information Needs**

None noted at this time.

## **5.3 SOLVENT RETURN AND FILL STATION DUMPSTERS**

### **5.3.1 Information Summary**

#### **Unit Description**

Two dumpsters comprise this unit, which is affixed to the southern end of the main building. The dumpsters are topped with a car-port like cover. The two dumpster have the following dimensions: 5 feet X 3 feet X 40 inches each. Each dumpster is constructed of steel and each has a total capacity of 750 gallons (Safety-Kleen 1987). At the time of the VSI, the dumpsters appeared to be in good condition. No dents or rusted areas were noted. The dumpsters are inspected daily by the Branch Manager and quarterly inspections are conducted by the Regional Manager. The location of the two dumpsters is shown on Figure 2-3.

#### **Date of Start Up**

April 11, 1985

#### **Date of Closure**

Active

#### **Waste Managed**

Spent solvents transported from Safety-Kleen customers are poured into the dumpsters at the return and fill station and then immediately pumped into the 15,000-gallon spent solvent storage tank described in Section 5.2 (Appendix A, Photograph #2). Sludge also accumulates in the bottom of these dumpsters. The dumpsters are completely emptied bi-weekly. The sludge is removed manually with a shovel. This waste is drummed and stacked two drums high in the warehouse drum storage area (Section 5.1).

The drums are color-coded red to identify their contents. After accumulation of sufficient material, the sludge is shipped to the Elgin facility for treatment. Figure 5-2 shows the unit process for the

**Date of Start Up**

April 11, 1985

**Date of Closure**

Active

**Wastes Managed**

The paint wastes consist of various lacquer thinners (D001 - ignitable), (F003 and F005 - spent non-halogenated solvents) and paints (CFR40 1987). Paint wastes are placed in 5-gallon pails, and 16-gallon and 55-gallon drums, and are stored in the enclosed metal shelter at the facility. No more than six, 55-gallon drums of flammable waste, 10, 5-gallon pails of paint thinner, and 10, 16-gallon drums of paint thinner will be stored in the metal shelter at any given time. The maximum capacity of all wastes is 1,100 gallons.

The ignitable wastes are supposed to be stored at least 50 feet from the property line to remain in compliance with 40 CFR 264.176. This SWMU is less than 50 feet from a property boundary. In February 1988, Safety-Kleen was issued a compliance variance by KDHE to allow storage within the 50 feet limit. If a container holding waste is rusting, shows apparent structural defects, or begins to leak, the contents are transferred into a lined (polyethylene) overpack container in good condition. Containers in the paint waste storage shelter are kept closed except when wastes are being added or removed. The containers are inspected daily by the Branch Manager, or his alternate. Quarterly inspections are conducted by the Regional Manager (Safety-Kleen 1987). At the time of this VSI, the paint waste metal storage shelter and its contents appeared to be in good condition. No dents or rust were noted on the building or drums inside (Appendix A, Photographs #5 and #6). Figure 5-2 shows the unit process for the handling of paint waste to the recycling center.

**Release Controls**

Secondary containment for the paint waste storage shelter is in the form of 20-foot X 15-foot X 6-inch (1,122 gallon) concrete slab with a metal pan at its base. Spilled or leaked waste will be removed in a

timely manner to prevent overflow of the collection system. The major concern of release would be the air pathway. Cracks or rusted drums and/or improper sealant of drums could cause release to the air.

#### **History of Release**

Available file information provided no documentation or indication of releases from this unit. Observations made during the VSI provided no indications of releases from this unit. Drummed wastes were neatly staged and containers were in good condition. No liquid was noted in the containment area.

#### **5.4.2 Further Information Needs**

None noted at this time.

## SECTION 6: SUMMARY OF SITE VISIT

The VSI of Safety-Kleen in Edwardsville, Kansas, was conducted on March 8, 1990. The VSI began at 1230 hours and was complete by 1500 hours. The inspection was conducted by E & E/FIT personnel Jim Fick and Otavio Silva, and Safety-Kleen representatives Mike Zytka and Joel Zimmerman. The VSI included the inspection of the warehouse drum storage area, the return and fill dumpster area located immediately behind the warehouse, the aboveground storage tank and the paint waste metal storage shelter. Each of these material handling/storage areas was identified as a SWMU.

All four SWMUs have a secondary containment system. No indications of any release of wastes were observed by E & E/FIT from any identified SWMU. The only observed release of wastes noted occurred when volatile organic compounds were found in the warehouse drum storage area with HNu reading of 3 ppm (benzene equivalents). This release may be caused by spillage on the outside of the drum and not a release from the drums. This room has a ventilation fan located in the southeastern corner of the building, and warehouse air is vented into the outside air. Photos were taken of each identified SWMU by E & E/FIT during the VSI and are summarized in Table 6-1. Photos are attached in Appendix A.

After inspecting the SWMUs, E & E/FIT inspected the perimeters of the building and the surrounding ground owned by Safety-Kleen. No indication of any waste handling activities were noted throughout the rest of the property.

A brief discussion was held after the VSI between E & E/FIT personnel and Safety-Kleen representatives, concerning the inspections conducted at the facility. Zytka said that he performs a weekly inspection of the facility which includes safety, emergency equipment, security devices, and miscellaneous equipment. Zimmerman said that he conducts a quarterly inspection of the facility and completes a Facility Management Inspection Report after each inspection. A copy of the latest inspection reports is attached in Appendix C.

Table 6-1  
Photo Summary  
Safety-Kleen Corporation  
Edwardsville, Kansas  
E & E/FIT; March 8, 1990

Photo Number	Photo Description
1	Warehouse Drum storage room.
2	Two dumpsters located in Return and Fill station area.
3	Two aboveground storage tanks.
4	Two aboveground storage tanks containment diking.
5	Paint Waste Metal Storage Shelter.
6	Drums stored in the paint waste Metal Storage Shelter.



## SECTION 7: SUMMARY

On March 8, 1990, a VSI was conducted by the E & E/FIT in support of the EPI/PA at the Safety-Kleen Corporation storage and transfer facility in Edwardsville, Kansas. The scope of the EPI/PA was to identify and characterize potential and actual releases from Solid Waste Management Units at the facility. Safety-Kleen Corporation is an accumulation and storage point for spent solvents and paint thinners intended for future recycling. All wastes are ultimately shipped to Safety-Kleen recycling facilities which are properly permitted, either under interim status or Part B permit. Tank bottoms and dumpster sludges are generated from the storage of the spent solvents. These materials are eventually disposed of off site to an incinerator or to a reclamation center.

E & E/FIT identified four SWMUs during the VSI at the facility. The SWMUs identified by FIT are briefly described below:

1. Warehouse drum storage room - This SWMU consists of drums of dumpster sludge (D001, D006, D007, D008) and drums of spent solvents (F002 and F004). This SWMU has secondary containment.
2. Solvent Return and Fill Station Dumpsters - This SWMU handles spent solvents, primarily mineral spirits and sludge. As soon as the solvents are dumped into the two dumpsters, they are pumped to either the aboveground storage tank or they are drummed and stored in the warehouse drum storage area. This SWMU has a maintained secondary containment structure.
3. Aboveground Storage Tank (15,000-gallon steel) - The SWMU consists of spent mineral spirits solvent and tank bottom sludge. This SWMU has a secondary containment structure. Also, the piping system which connects the dumpsters with the tanks is included with this SWMU.
4. Paint Waste Metal Storage Shelter - This SWMU contains various sized drums of paint thinners. This SWMU has a maintained secondary containment system.

## SECTION 8: BIBLIOGRAPHY

- Ecology and Environment, Inc., Field Investigation Team, July 1989, Final Report of Renner Road Shooting Range Site, TDD #F-07-8908-003.
- Gentile, Richard, May 3, 1990, Professor University of Missouri, Kansas City, Telephone Conversation with Jim Fick, E & E/FIT.
- Gilliland, Don, April 2, 1990, Stream Biologist, Kansas Department of Health and Environment, Telephone conversation with Jim Fick, E & E/FIT.
- Gray, Don, May 2, 1990, Board of Public Utilities, Kansas City, Kansas, Telephone Conversation with Jim Fick, E & E/FIT.
- Hasan, Syed E., et al, 1988, Geology of Greater Kansas City, Missouri and Kansas, Bulletin of the Association of Engineering Geologists, Vol. 25 #3 227-342.
- Jewett, John M. and Newell, Norman, D., May 15, 1935, State Geological Survey of Kansas Bulletin 21 - Part I (The Geology of Johnson and Miami Counties, Kansas), Part II (The Geology of Wyandotte County, Kansas), Lawrence, Kansas, State Geological Survey.
- Lekie, Dan, April 2, 1990, Biologist, Wildlife Parks & Recreation, Telephone conversation with Jim Fick, E & E/FIT.
- Missouri Geological Survey and Water Resources, 1961, The Stratigraphic Succession in Missouri, Vol. 40, 2nd Series, Rolla, Missouri.
- Safety-Kleen Corp., November 1987, Storage Facility Permit Application Safety-Kleen Corp. Service Center, Edwardsville, Kansas KSD980973515, Safety-Kleen Corp.
- U.S. Department of Agriculture, 1977, Soil Survey of Leavenworth and Wyandotte Counties, Kansas, National Cooperative Soil Survey, Washington, D.C.
- U.S. Environmental Protection Agency, 1988, HRS Net Precipitation Values, MITRE Corporation, Washington, D.C.
- U.S. Geological Survey, 1974, Ground Water in the Kansas River Valley Junction City to Kansas City, Kansas, Lawrence, Kansas, University of Kansas Publications.
- U.S. Geological Survey, 1984, 7.5 Minute Series Topographic Map, Edwardsville Quadrangle, Kansas, Washington, D.C.

U.S. Government, July 1, 1987, Code of Federal Regulations, Part 261.31,  
Washington, D.C., Office of the Federal Register National Archives  
and Records Administration.

Zytka, Mike, May 2, 1990, Branch Manager, Safety-Kleen Corporation,  
Telephone Conversation with Jim Fick, E & E/FIT.

APPENDIX A

PHOTOGRAPHS



**ecology and environment, inc.**

**PHOTOGRAPHIC RECORD**

**SITE NAME:** Safety - Kleen

**SITE LOCATION:** Edwardsville, Kansas

**TDD/PAN#:** E-07-9002-003/FKS0284RA

No.: 1

Subject

Drums located in the Ware-  
house Drum storage room,  
inside the warehouse.

Photographer

Jim Fick

Witness

Otavio Silva

Date/Time

03/08/90 - 12:58 hrs.

Direction

Southeast



No.: 2

Subject

Two dumpsters located in  
the return and fill system  
area (loading/unloading  
dock area).

Photographer

Jim Fick

Witness

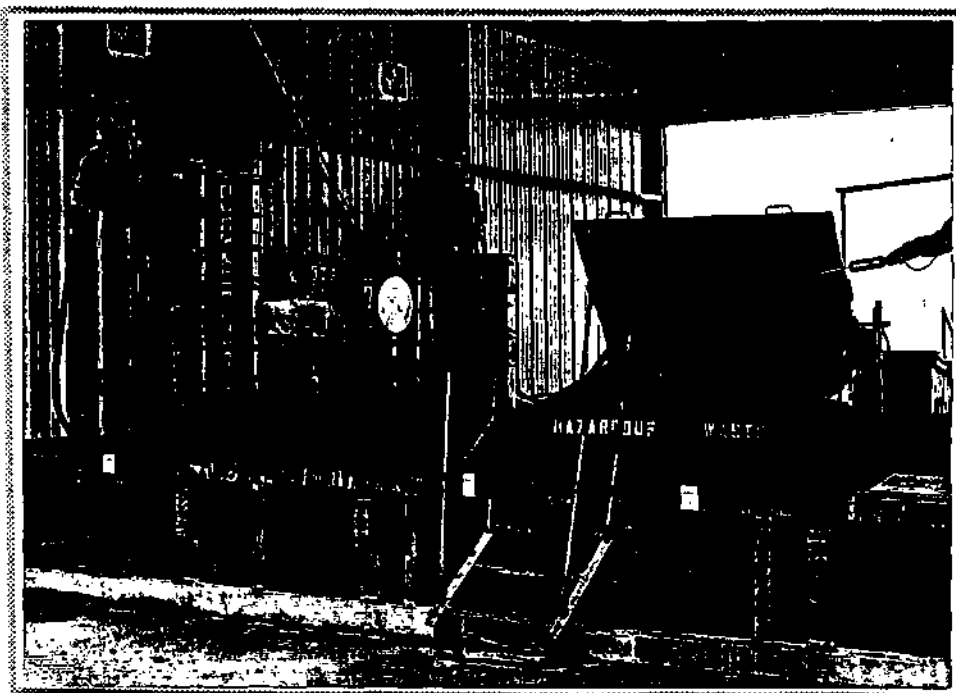
Otavio Silva

Date/Time

03/08/90 - 12:58 hrs.

Direction

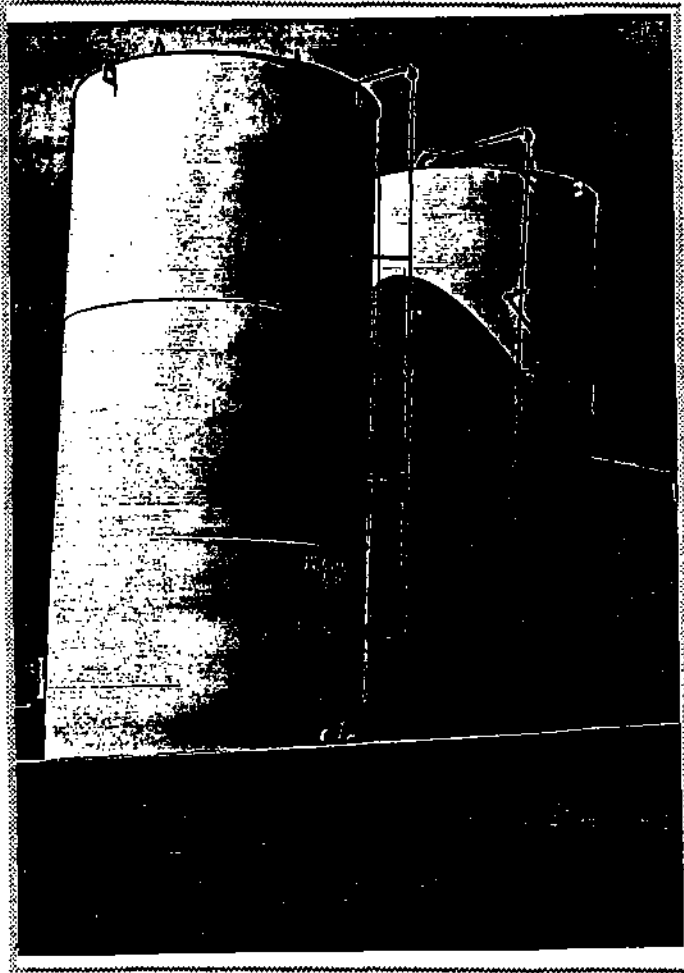
West





# ecology and environment, inc.

## PHOTOGRAPHIC RECORD



SITE NAME: Safety - Kleen

SITE LOCATION: Edwardsville, Kansas

TDD/PAN#: E-07-9002-003/EKS02848A

No.: 3

Subject

Two aboveground storage tanks.

Photographer

Jim Fick

Witness

Otavio Silva

Date/Time

03/08/90 - 13:40 hrs.

Direction

Northwest

No.: 4

Subject

Two aboveground storage tanks and containment diking.

Photographer

Jim Fick

Witness

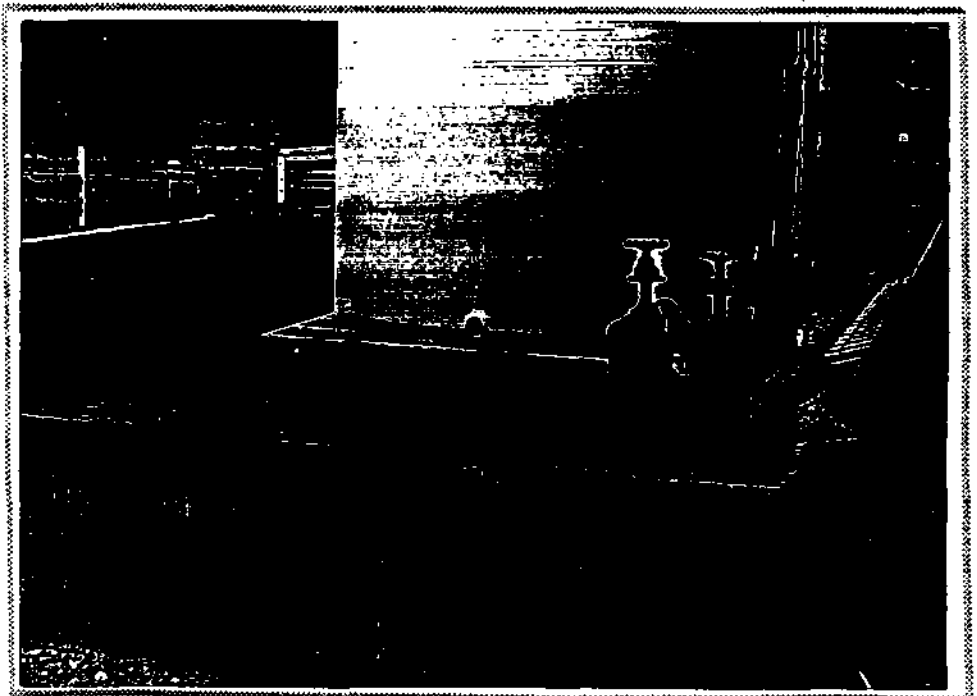
Otavio Silva

Date/Time

03/08/90 13:06 hrs.

Direction

North





**ecology and environment, inc.**

**PHOTOGRAPHIC RECORD**

**SITE NAME:** Safety - Kleen

**SITE LOCATION:** Edwardsville, Kansas

**TDD/PAN#:** E-07-9002-003/EKS0284RA

**No.:** 5

**Subject**

Paint waste storage  
shelter.

**Photographer**

Jim Fick

**Witness**

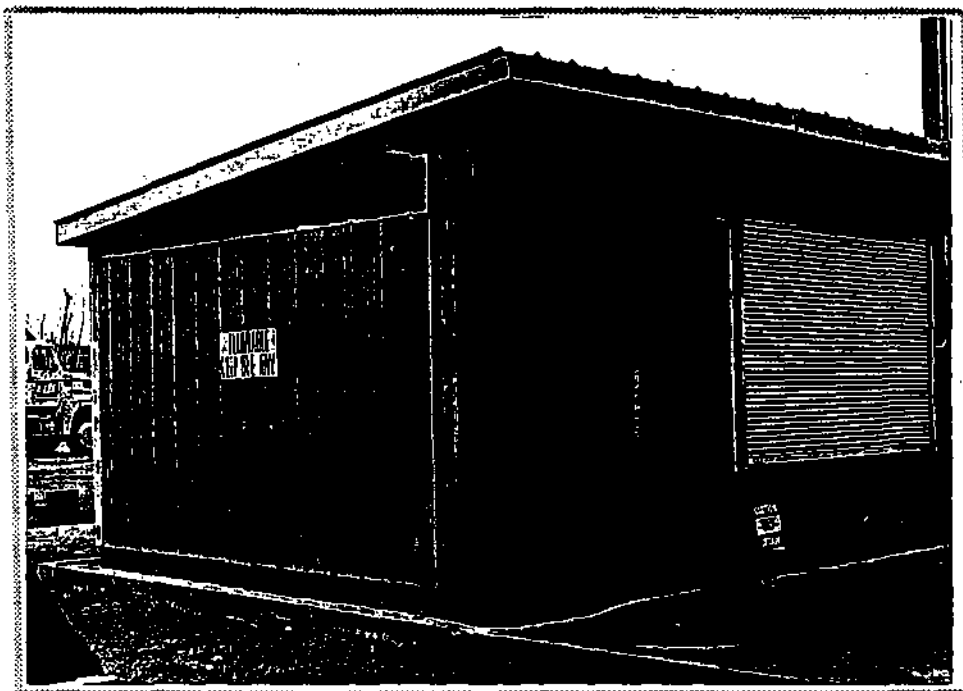
Otavio Silva

**Date/Time**

03/08/90 - 13:11 hrs.

**Direction**

Southwest



**No.:** 6

**Subject**

Drums stored in the paint  
waste storage shelter.

**Photographer**

Jim Fick

**Witness**

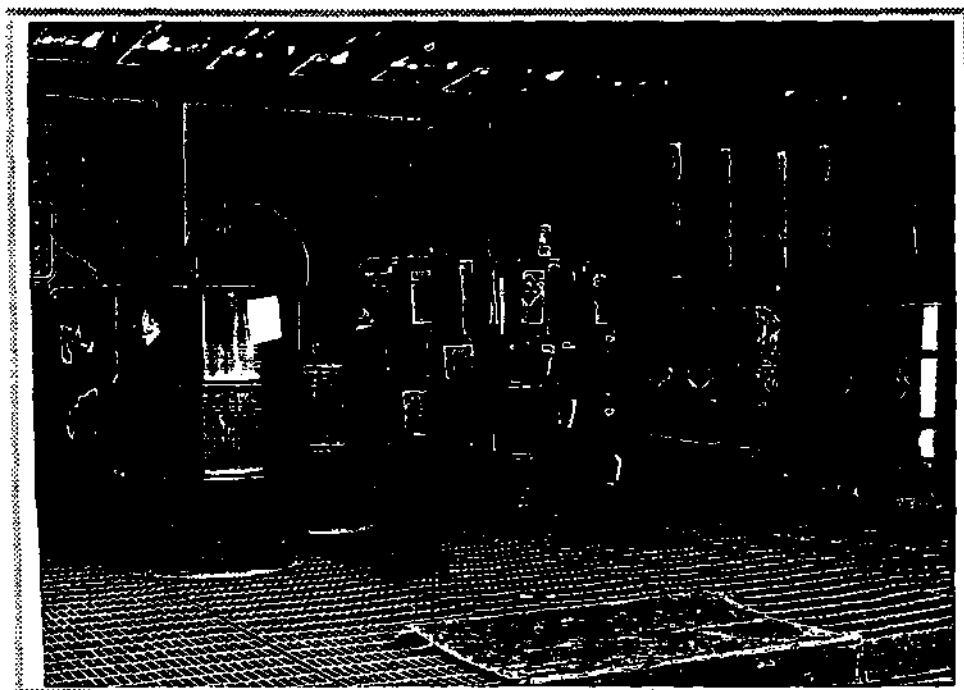
Otavio Silva

**Date/Time**

03/08/90 - 13:13 hrs.

**Direction**

Southwest



APPENDIX B

EPA PRELIMINARY ASSESSMENT FORM 3070-12





EPA

01 STATE  
K5

02 SITE NUMBER  
D980973515

(Check all that apply)

X A. SOLID		E. SLURRY	
1	1	1	1
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3	3	3	3
4	4	4	4
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B. POWDER, FINES    X F. LIQUID

X C. SLUDGE	G. GAS
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99	99
100	100

**D. OTHER**

(Specify)

(Specify)

(Measures of waste quantities must be independent)

**TONS unknown**

CUBIC YARDS

	NO. OF DRUMS
100	100
90	90
80	80
70	70
60	60
50	50
40	40
30	30
20	20
10	10
0	0

(Check all that apply)

X A. TOXIC

### E. SOLUBLE

X I. HIGHLY VOLATILE

**B. CORROSIVE**

**F. INFECTIOUS**

**J. EXPLOSIVE**

### C. RADIOACTIVE

X G. FLAMMABLE

K. REACTIVE

X D. PERSISTENT

**X H. IGNITABLE**

**L. INCOMPATIBLE**

\_\_\_\_\_

[illegible]

M. NOT APPLICABLE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			Spent mineral spirits; lacquers; and
PSD	PESTICIDES			immersion cleaner
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			Paint wastes; spent solvents

[illegible]

N/A

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

EPA - RCRA Files  
Safety-Kleen Corp. Files  
Kansas Department of Health and Environment Files

# POTENTIAL HAZARDOUS WASTE SITE

**EPA**

## PRELIMINARY ASSESSMENT

## I. IDENTIFICATION

01 STATE KS	02 SITE NUMBER D980973515
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### PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

## II. HAZARDOUS CONDITIONS AND INCIDENTS

01	A. GROUNDWATER CONTAMINATION	02	OBSERVED (DATE: _____)	POTENTIAL	ALLEGED
03	POPULATION POTENTIALLY AFFECTED: _____	04	NARRATIVE DESCRIPTION		
	None known.				

01	B. SURFACE WATER CONTAMINATION	02	OBSERVED (DATE: _____)	POTENTIAL	ALLEGED
03	POPULATION POTENTIALLY AFFECTED: _____	04	NARRATIVE DESCRIPTION		
	None known.				

01 X C. CONTAMINATION OF AIR                      02 X OBSERVED (DATE: 3/8/90)    POTENTIAL    ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION  
HNU readings of 3 ppm were detected in ambient air in the warehouse drum storage area during the FIT VS. This building is vented to the outside air.

01	X D. FIRE/EXPLOSIVE CONDITIONS	02	___ OBSERVED (DATE: _____) X POTENTIAL ___ ALLEGED
03	POPULATION POTENTIALLY AFFECTED: _____	04	NARRATIVE DESCRIPTION

01 <u>X</u> E. DIRECT CONTACT	02 <u>      </u> OBSERVED (DATE: <u>      </u> ) <u>X</u> POTENTIAL <u>      </u> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>      </u>	04 NARRATIVE DESCRIPTION

01	F. CONTAMINATION OF SOIL	02	OBSERVED (DATE: )	POTENTIAL	ALLEGED
03	AREA POTENTIALLY AFFECTED: (Acres)	04	NARRATIVE DESCRIPTION		
None known.					

01      G. DRINKING WATER CONTAMINATION                      02      OBSERVED (DATE:           )      POTENTIAL      ALLEGED  
03 POPULATION POTENTIALLY AFFECTED:                      04 NARRATIVE DESCRIPTION  
  
None known.

01	X	H. WORKER EXPOSURE/INJURY	02	___	OBSERVED (DATE: _____)	X	POTENTIAL	___	ALLEGED
03	WORKERS POTENTIALLY AFFECTED: _____		04	NARRATIVE DESCRIPTION					
None known.									

01	I. POPULATION EXPOSURE/INJURY	02	OBSERVED (DATE: )	POTENTIAL	ALLEGED
03	POPULATION POTENTIALLY AFFECTED:	04	NARRATIVE DESCRIPTION		
None known.					

## POTENTIAL HAZARDOUS WASTE SITE

## PRELIMINARY ASSESSMENT

## I. IDENTIFICATION

01 STATE KS	02 SITE NUMBER D980973515
----------------	------------------------------

EPA

## PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

## II. HAZARDOUS CONDITIONS AND INCIDENTS (CONTINUED)

01    J. DAMAGE TO FLORA 02    OBSERVED (DATE:           )    POTENTIAL    ALLEGED

## 04 NARRATIVE DESCRIPTION

None known or observed to date.

01    K. DAMAGE TO FAUNA 02    OBSERVED (DATE:           )    POTENTIAL    ALLEGED

## 04 NARRATIVE DESCRIPTION (Include name(s) of species)

None known or observed to date.

01    L. CONTAMINATION OF FOOD CHAIN 02    OBSERVED (DATE:           )    POTENTIAL    ALLEGED

## 04 NARRATIVE DESCRIPTION

None known.

01    M. UNSTABLE CONTAINMENT OF WASTES 02    OBSERVED (DATE:           )    POTENTIAL    ALLEGED

(Spills/runoff/standing liquids/leaking drums)

03 POPULATION POTENTIALLY AFFECTED:            04 NARRATIVE DESCRIPTION

None observed.

01    N. DAMAGE TO OFFSITE PROPERTY 02    OBSERVED (DATE:           )    POTENTIAL    ALLEGED

## 04 NARRATIVE DESCRIPTION

None observed.

01    O. CONTAMINATION OF SEWERS,  
STORM DRAINS, WWTPs 02    OBSERVED (DATE:           )    POTENTIAL    ALLEGED

## 04 NARRATIVE DESCRIPTION

None known.

01    P. ILLEGAL/UNAUTHORIZED DUMPING 02    OBSERVED (DATE:           )    POTENTIAL    ALLEGED

## 04 NARRATIVE DESCRIPTION

None known or observed to date.

## 05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None known.

III. TOTAL POPULATION POTENTIALLY AFFECTED: unknown to date

## IV. COMMENTS

This facility has been in operation since April 1985. It is an accumulation point for spent solvents (hazardous wastes) generated by Safety-Kleen customers. The hazardous wastes are sent to a reclamation center for disposal.

## V. SOURCES OF INFORMATION (Cite specific references. e.g., state files, sample analysis, reports)

EPA - RCRA Files  
Safety-Kleen Corp. Files  
Kansas Department of Health and Environment Files

APPENDIX C

FACILITY INSPECTION REPORT FORM

INSPECTION LOG SHEET FOR: Weekly Inspection of SAFETY AND EMERGENCY EQUIPMENT,  
SECURITY DEVICES AND MISCELLANEOUS EQUIPMENT

INSPECTOR'S NAME/TITLE: \_\_\_\_\_

INSPECTOR'S SIGNATURE: \_\_\_\_\_

DATE OF INSPECTION (Month/Day/Year): \_\_\_\_\_

TIME OF INSPECTION: \_\_\_\_\_

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers: \_\_\_\_\_ A N

If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: \_\_\_\_\_

Eyewash and Shower: \_\_\_\_\_ A N

If 'N', circle appropriate problem: disconnected malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain leaking, other: \_\_\_\_\_

First Aid Kit: \_\_\_\_\_ A N

If 'N', circle appropriate problem: inadequate inventory, other: \_\_\_\_\_

Spill Cleanup Equipment: \_\_\_\_\_ A N

If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: \_\_\_\_\_

Personal Protection Equipment: \_\_\_\_\_ A N

If 'N', circle appropriate problem: inadequate supply of aprons, gloves, glasses, respirator, other: \_\_\_\_\_

SECURITY DEVICES:

Gates and Locks: \_\_\_\_\_ A N

If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: \_\_\_\_\_

Fence: \_\_\_\_\_ A N

If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, other: \_\_\_\_\_

MISCELLANEOUS EQUIPMENT:

Dry Dumpster: \_\_\_\_\_ A N

If 'N', circle appropriate problem: rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other: \_\_\_\_\_

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)







INSPECTION LOG SHEET FOR: Daily Inspection of STORAGE TANK SYSTEM

INSPECTOR'S NAME/TITLE: \_\_\_\_\_

INSPECTOR'S SIGNATURE: \_\_\_\_\_

	MON	TUES	WED	THURS	FRI
--	-----	------	-----	-------	-----

DATE: (M/D/Y) \_\_\_\_\_

TIME: \_\_\_\_\_

STORAGE TANKS: 15,000  
(TANKS MUST NEVER BE MORE THAN 95% FULL!)

Volume in Product Tank (in./gal.)

(in./

Volume in Second Product Tank gal.)

Volume in Waste Tank (in./gal.)

Volume in Second Waste Tank (in./gal.)


Tank Exterior

A N

A N

A N

A N

A N

If 'N', circle appropriate problem: rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion, other: \_\_\_\_\_

High Level Alarms

A N

A N

A N

A N

A N

If 'N', circle appropriate problem: malfunctioning "Power On" light, malfunctioning siren/strobe light, other: \_\_\_\_\_

Volume Gauges

A N

A N

A N

A N

A N

If 'N', circle appropriate problem: disconnected, sticking, condensation, other: \_\_\_\_\_

## CONTAINMENT AREA (Tank Dike):

Bottom and Walls

A N

A N

A N

A N

A N

If 'N', circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots/stains, deterioration, displacement, leaks, other: \_\_\_\_\_

Self-closing Drain Valve

A N

A N

A N

A N

A N

If 'N', circle appropriate problem: open, leaks, other: \_\_\_\_\_

Rigid Piping and Supports

A N

A N

A N

A N

A N

If 'N', circle appropriate problem: distortion, corrosion, paint failure, leaks, other: \_\_\_\_\_

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: \_\_\_\_\_

\*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

INSPECTION LOG SHEET FOR: Daily Inspection of STORAGE TANK SYSTEM

INSPECTOR'S NAME/TITLE: \_\_\_\_\_

INSPECTOR'S SIGNATURE: \_\_\_\_\_

	<u>MON</u>	<u>TUES</u>	<u>WED</u>	<u>THURS</u>	<u>FRI</u>
<b>TRANSFER PUMPS AND HOSES</b>					
Pump Seals	A* N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Motors	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: overheating, other: _____					
Fittings	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, other: _____					
Valves	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: leaks, sticking, other: _____					
Hose Connections and Fittings	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracked, loose, leaks, other: _____					
Hose Body	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: crushed, cracked, thin spots, leaks, other: _____					

**RETURN AND FILL STATION**

Wet Dumpster	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: excess sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, other: _____					
Secondary Containment	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: excess sediment/liquid, leaks, deterioration, distortion, excess debris, other: _____					
Loading/Unloading Area	A N	A N	A N	A N	A N
If 'N', circle appropriate problem: cracks, ponding/wet spots, deterioration, other: _____					

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: \_\_\_\_\_

\*A = ACCEPTABLE

N = NOT ACCEPTABLE

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

III. SERVICE CENTER INTERIOR

## Warehouse Area Appearance

75.	All materials are stacked and stored in an orderly manner.	(2)	0	2
76.	Unboxed Parts Washers are stored neatly.	(2)	0	2
77.	All Parts Washers have proper labelling.	(2)	0	2
78.	IC units are stored neatly.	2	(0)	0
79.	No discarded vehicle parts or recreational vehicles in warehouse.	(2)	0	2
80.	Floor is clean and properly maintained.	(2)	0	2
81.	No objectionable signs or pictures are posted.	(2)	0	2
82.	All windows are properly maintained (not broken or dirty).	(2)	0	2
83.	Overhead door(s) are properly maintained and in good working order.	(2)	0	2
84.	No flammable materials are stored under the stairway to the mezzanine.	(2)	0	2
85.	Restrooms and locker rooms are clean and in good condition.	(2)	0	2
86.	All locker room and bathroom fixtures are clean and operating properly.	(2)	0	2
87.	An adequate amount of soap is provided and is clean.	(2)	0	2
88.	An operating exhaust mechanism is provided.	(2)	0	2
89.	Facilities are provided for neatly hanging clean uniforms, and it is used.	2	(0)	0
90.	Soiled uniforms are neatly stored in a container.	(2)	0	2
91.	Empty hangers are neatly stored for collection.	(2)	0	2
92.	Separate facilities are provided for storing street clothes away from work items.	(2)	0	2
93.	All employees handling waste materials take showers before going home.	2	(0)	0
94.	Towels for showers are provided to all employees required to shower.	(2)	0	2
95.	No work items worn on the job are taken home (dirty uniforms, shoes, jackets, etc.).	(2)	0	2

## Warehouse Area Procedure

96.	Allied product storage is in a controlled access area, wire cage, room, etc.	(2)	0	2
97.	No spray painting of parts washers is conducted at the site.	(2)	0	2
98.	Discarded truck batteries are not stored at the branch.	(2)	0	2
99.	Stairs with handrail provided as access to storage over office or cage.	(2)	0	2
100.	A load limit sign for the mezzanine is posted.	(2)	0	2
101.	There is a handrail around the storage area with a toe or kick plate on the edge.	(2)	0	2
102.	Immersion Cleaner units are not transported on a drum unless the drum lid is also secured in place	(2)	0	2

## Drum Storage Area

103.	All waste IC, Dry Cleaning, Paint and MS Sludge drums are stored in contained areas.	(2)	0	2
104.	All waste drums are stacked on pallets if possible, but not more than two high and wide if not.	(2)	0	2
105.	All Waste Ignitable drums (MS, MS Sludge, Paint, FRS) are stored 50' from the property line.	(2)	0	2

PAGE POSSIBLE	62	52
LESS N/A	—	—
PAGE SUBTOTAL	62	56

## GOOD FAIR NONE POINTS

106.	All waste drums/pallets are stored with a minimum 2' wide aisle space on two opposite sides.	2	0	0
107.	Waste Gun Cleaner drums are stored in an approved flammables area.	2	0	2
108.	The Paint shed is 50' from the property line to terminate manifests.	2	0	2
109.	All clean and dirty gun cleaner drums are on the active Paint truck if no approved flammables area is available.	2	0	2
110.	No containers other than S-K approved drums or boxes are used or stored on site.	2	0	2
111.	All drums are properly closed and sealed.	2	0	0
112.	All waste drums have a completed hazardous waste label attached.	2	0	0
113.	All hazardous waste labels are located on the drum side (not the lid) and are right side up.	2	0	2
114.	The accumulation start date and TSD storage date are filled in on every label.	2	0	2
115.	Completed Tranship labels are placed on both ends of wrapped pallets of waste drums to be shipped to the R/C, or are placed on all individual drums.	2	0	2
116.	Tranship labels are not placed on pallets that have drums that are in transfer mode.	2	0	2
117.	All Model 14 containers with dirty solvent have waste labels attached.	2	0	2
118.	The solvent drum storage area has at least one "No Smoking" sign.	2	0	2
119.	All grating over trenches are in good condition and not deformed by excess weights.	2	0	2
120.	There are no cracks or potential leak points in the containment area.	2	0	2
121.	The number of waste drums in storage is less than the limit established in the Part A notification or the Part B Application / Permit. Gallons of container storage in permit: _____ Gallons of containers at site: <u>396</u> (Consider all drums full)	2	0	2
122.	Spent 609 pails are returned to the branch in labelled grey drums and returned to the R/C.	2	0	2
123.	IC material is not poured into another container.	2	0	2
124.	Transfer wastes do not exceed the permitted transfer time limit.	2	0	2
125.	A manifest board is located in the warehouse near the waste drum storage area.	2	0	2
The manifest board has the following items posted on it:				
126.	No more than 2-3 presigned manifests for each type of shipment.	2	0	2
127.	Land-Ban restriction notifications are attached as necessary.	2	0	2
128.	Tank gauging charts clearly indicating which tanks are which sizes.	2	0	0
129.	Emergency contact list.	2	0	0
130.	Home phone numbers for all Emergency Coordinators and their Alternates.	2	0	0

PAGE POSSIBLE	50	50
LESS N/A	=	-
PAGE SUBTOTAL	5	38

## Office Appearance

131.	Office doors are clean and free of dirt, finger prints, and non-SK approved decals.	(2)	0	2
132.	Office windows are clean and free of dirt and non-SK approved decals.	(2)	0	2
133.	Office floor is clean, waxed, and free of solvent stains and soil.	(2)	0	2
134.	All office furniture is in good condition and suitable for office use.	(2)	0	2
135.	A bulletin board or chalk board is used for sales records and S-K information.	(2)	0	2
136.	Office is generally organized and well maintained.	(2)	0	2
137.	Adequate lighting is present in all offices.	(2)	0	2
138.	There is no overloading of electrical outlets through the use of multiple extension cords or multi-plugs.	(2)	0	2

## IV. OFFICE PROCEDURE

## Manifests:

139.	Review the prior day's paperwork for each rep. All information is correctly completed and drum counts are correct on corresponding manifests and preprints.	(2)	0	2	
140.	All past manifest copies are maintained at the site for three years.	(2)	0	2	
141.	All records are stored in a location that is safe from fire hazard.	(2)	0	2	
142.	A system exists to know if a manifest is late returning from a TSDP (30 days).	(2)	0	2	
143.	There are no outbound manifests that have not received the final signed copy from the TSDP within 30 days.	(2)	0	2	
144.	The TSDP signature on the manifests received at the site are not the same as the driver or generator( truck per day manifest).	(2)	0	2	
145.	Compliance with obtaining customer USEPA identification numbers for PARTS WASHER customers (100-95X=2, 85-94.9X=1, less than 85X=0). Check Target List.	2 (2)	0	1	
146.	Compliance with obtaining customer USEPA identification numbers for GUN CLEANER customers (100-95X=2, 85-94.9X=1, less than 85X=0). Check Target List.	(2)	1	0	2
147.	Compliance with obtaining customer USEPA identification numbers for DRY CLEANING customers (100-95X=2, 85-94.9X=1, less than 85X=0). Check Target List.	X	1	0	—
148.	Manifests are completed correctly. Check Branch Error Evaluation Report. (100-99X=2, 98.9-95X=1, less than 95X=0).	(2)	1	0	2
149.	Errors identified by manifest department are responded to within 15 days. See Manifest Response Report. (100-95X=2, 94.9-90X=1, less than 90X=0).	(2)	1	0	2
150.	All Generator and Facility Annual Hazardous Waste Reports are on file for the past 3 years.	(2)	1	0	2

PAGE POSSIBLE	40	40
LESS N/A	—	—
PAGE SUBTOTAL	40	39

## Inspections:

151. "Facility Inspection Records" are completed daily, accessible for inspection, and retained for 3 years.
152. All inspection forms for the most recent 3 periods are in the file. (100%=2, missing 1-2=1, missing more than 2=0).
153. All inspections for the most recent 4 weeks are inspected and all information properly entered.
154. Actual drum counts and volumes and tank inventories are entered each day.
155. All inspection records are signed in ink and dated.

(2)	0	<u>2</u>
(2)	1	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>

## Training:

156. An individual training file is kept on every employee.
157. The training file includes documentation of all training received.
158. The file contains:  
employee name,  
job title,  
job description,  
description of training  
courses received,  
documentation of having  
received training.
159. No other personnel related information is kept in the file.
160. Training files are kept on-site while employed at the site or after termination.
161. Training files are transferred with the employee to the new site.
162. New employees must be fully trained within 6 months and may not work alone until fully trained and training documented.
163. Contingency Plan refresher training is conducted annually.
164. Respirator training program is in place which properly trains employees on:  
respirator use,  
hygiene,  
maintenance,  
proper storage.

(2)	0	<u>2</u>
(2)	0	<u>2</u>
2	(0)	<u>0</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
2	(0)	<u>0</u>
2	0	<u>NA</u>

## Waste Analysis Plan:

165. Period summaries of Mineral Spirits analyses are on file.
166. All outbound waste streams have annual analyses on file.
167. Mineral spirit drums that may be low-flash are not accepted.

(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>

## Contingency Plan / Spill Reporting:

168. All spills in excess of 1 pound (1 cup) are reported to Elgin.
169. A copy of the Field Spill Report is on file for all spills and a copy to EHS.
170. The Contingency Plan and its Emergency Contact list is up-to date.
171. A copy of the plan has been sent to local Fire, Police and hospital.
172. Letters acknowledging receipt of the plan have been received from the above.

(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
2	(0)	<u>0</u>
2	(0)	<u>0</u>

PAGE POSSIBLE 44

LESS N/A —

PAGE SUBTOTAL 44

44

—

36

## Filing

173. The Operating Log is kept up to date with all received and shipped waste loads.
174. The Operating Log tracks all drums left behind and the dates of subsequent shipment.
175. The waste code is entered for FRS drums.
176. All generated wastes are entered in log.
177. Corrections are properly made.
178. All environmental files are readily accessible and well organized.

(2)	(2)	2
(2)	0	2
(2)	0	2
(2)	0	2
(2)	0	2
(2)	0	2

## Postings

The following items must be prominently posted on a bulletin board:

179. ✓ Sexual Harassment Policy.  
(202 CFS)
- ✓ Employee Polygraph  
Protection Act Poster
- ✓ Open Door Policy (407 CFS)
- ✓ EEO Corporate  
Policy/Statement (104 CFS)
- ✓ EEO poster
- ✓ Minimum Wage Poster
180. ✓ Environment, Health, and  
Safety Policy
- ✓ Job Safety and Health  
Protection Poster
- ✓ Disaster and Fire Plan
- ✓ Contingency Plan
- ✓ Emergency exit map
- ✓ List of emergency  
coordinators
- ✓ Minimum Wage Poster
- ✓ Right To Know Poster
- ✓ OSHA 200 Log

(2)	0	2
(2)	0	2

## Health and Safety:

181. All occupational injury and illness reports are on file for the past 5 years.
182. OSHA 200 log entries are made within 10 days of occurrence.
183. HSE Period Summaries are completed and mailed within 5 days of period close.
184. The following statistics are known and available:
- Total Recordable Incident Rate (TRIR)  
7.68
- Lost Workday Incident Rate  
0
- Last recordable injury date  
12-30-89
- Last lost workday  
12-30-89
185. Auto accident information is reported and filed.

(2)	0	2
(2)	0	2
(2)	0	2
(2)	0	2
(2)	0	2

PAGE POSSIBLE	26	26
LESS N/A	—	—
PAGE SUBTOTAL	26	26

## V. SAFETY EQUIPMENT

186.	All first aid kits are completely stocked, clean and readily accessible.	(2)	0	<u>2</u>
187.	An eyewash with handheld shower or deluge shower is located within 10 seconds travel time (maximum 100') of the Drum Storage area.	(2)	0	<u>2</u>
188.	An eyewash with handheld shower or deluge shower is located within 10 seconds travel time (maximum 100') of the Return and Fill Dock.	(2)	0	<u>2</u>
189.	An eyewash with handheld shower or deluge shower is located within 10 seconds travel time (maximum 100') of the bulk truck loading and unloading area.	<del>2</del>	0	<u>1</u>
190.	Access to all eyewashes/showers is unobstructed.	(2)	0	<u>2</u>
191.	No other materials are stored in the eyewash bowl.	(2)	0	<u>2</u>
192.	All eyewashes and shower nozzles work properly.	(2)	0	<u>2</u>
193.	A minimum of two 10-pound ABC fire extinguishers are installed per building.	(2)	0	<u>2</u>
194.	Fire extinguishers are hung from brackets near exits.	(2)	0	<u>2</u>
195.	All fire extinguishers are properly charged.	(2)	0	<u>2</u>
196.	An inspection tag is attached to each fire extinguisher showing charge and inspection date.	(2)	0	<u>2</u>
197.	The extinguisher inspection must be within the past 12 months.	(2)	0	<u>2</u>
198.	Exit signs are placed over doors to be used as emergency exits.	(2)	0	<u>2</u>
199.	The emergency exit doors are clear of all obstructions and in good working order.	(2)	0	<u>2</u>
200.	Emergency exit doors are not barred or key-locked closed while the building is occupied.	(2)	0	<u>2</u>
201.	The main electrical service location is easily accessible and free of obstruction.	(2)	0	<u>2</u>
202.	All electrical boxes and junction points are covered (no exposed wires).	(2)	0	<u>2</u>
203.	Sorbent material (pads and clay) is readily accessible in case of spills.	(2)	0	<u>2</u>
204.	Sorbents are located at the Return and Fill shelter and drum storage area.	(2)	0	<u>2</u>
205.	Material Safety Data Sheets (MSDS) are kept on file for all products.	(2)	0	<u>2</u>
206.	All other materials used at the site also have MSDS forms available.	(2)	0	<u>2</u>
207.	MSDS are given to all customers the first time they purchase or use a product.	(2)	0	<u>2</u>
208.	All proper safety equipment has been issued to the Sales Reps and Warehousemen.	(2)	0	<u>2</u>
209.	Proper safety equipment is worn by all Sales Reps and warehousemen.	(2)	0	<u>2</u>

PAGE POSSIBLE	<u>48</u>	<u>48</u>
LESS N/A	<u>2</u>	<u>2</u>
PAGE SUBTOTAL	<u>46</u>	<u>46</u>



## VI. TRUCKS

210. Spill control equipment on all trucks includes:  
properly stocked spill kit,  
absorbent pads,  
Field Spill Reports.
211. A properly charged and inspected fire extinguisher is in each truck.
212. All drums are strapped securely.
213. Drums are not double stacked on the truck.
214. Proper permits, authorisations, etc. are in place and easily accessible.
215. No waste drums are stored on spare vehicles that are not regularly on the road.
216. Trucks are neat and orderly without debris, unsightly piles of materials.
217. First aid kits are properly stocked and accessible.
218. Triangle reflectors are in each truck.
219. Hazardous waste labels are on all waste drums in the trucks.
220. Trucks with flammable liquids (gun cleaner) are not parked inside a building unless the room is explosion proof.

PAGE POSSIBLE 22  
LESS N/A —  
PAGE SUBTOTAL 22

	POSSIBLE	LESS N/A	ACTUAL
PAGE 1	38	—	38
PAGE 2	60	2	58
PAGE 3	50	12	38
PAGE 4	62	—	56
PAGE 5	50	—	35
PAGE 6	40	—	39
PAGE 7	44	—	36
PAGE 8	26	—	26
PAGE 9	48	2	44
PAGE 10	22	—	22
TOTAL POINTS	440	16	379
		424	89.3
		PERCENT	

DATE 12-6-84BRANCH 5-OPS-01SIGNATURE [Signature]

M. Z. [Signature]

PRINT J. C. Zimmerman

MIKE Zytka

Inspector

Branch Manager

# ITEMS TO BE WORKED ON FOR NEXT INSPECTION

- (25) Clean outside of dumpster
- (34) Replace lights on dock
- (61) Place maximum safe fill level on tanks
- (62) Paint tanks
- (66) Fix ~~low~~ high level alarm system
- (69) Label solvent pipes
- (78) Clean-up I.C. units
- (93) employees must wear shoes before leaving
- (106) provide 2' aisle space in containment room
- (111) Seal air dump
- (112) complete haz. waste labels
- (125-130) complete manifest barrel:
- (141) Continue compliance on EPA ID #s
- (154) Complete training file (job description)
- (171-172) Submit copy of cont-plan to local authority
- (197) Change one fire extinguishers

# FACILITY MANAGEMENT INSPECTION REPORT (FMIR)

BRANCH CITY Edwardsville  
 BRANCH MANAGER MIKE ZYKA  
 INSPECTOR J. Zimmerman

BRANCH NUMBER 5-085-01  
 INSPECTION DATE 12-6-89  
 START TIME 8:00 END TIME 12:30

SCORING PROCEDURE: Circle the score that is most appropriate. If the comment/standard is not applicable to this site, e.g., condition of fence if no fence exists, place an X through the highest possible score and deduct that amount from the total possible listed at the end of each page. Each inspection point is meant to be fully complied with, and therefore, only full compliance receives the maximum score of 2 points for each item. Lack of full compliance, or no compliance at all receive 0 points. A few items give the opportunity to receive partial credit based upon a percentage of compliance. These items have been marked with the possible middle score of 1 point. Select the most appropriate value for each inspection item.

REPORT DISTRIBUTION: After completing this report, the original should remain on file at the facility and copies made for and sent to: 1) Division Vice President, 2) Regional Manager, and 3) Environment, Health and Safety Department.

## I. SERVICE CENTER EXTERIOR

### Yard Area

1. Driveway swept clean and free of trash and debris.
2. Parking area swept clean and free of trash and debris.
3. No non-SK items stored in the yard.
4. Grass mowed, free of overgrown weeds and additional growth.
5. Fencing and gates in good condition.
6. Three strands of barbed wire in place and taut.
7. No gaps under the fence.
8. All gates and doors closed except when in active use.
9. "Danger Unauthorized Personnel Keep Out" signs posted at 50' intervals on all sides and on all gates and exterior doors outside the fence line (S-K Part No. 3202).
10. Similar "Danger" signs in the area's predominant second language are also posted as necessary (Spanish version S-K Part No. 1281).

### GOOD FAIR NONE POINTS

(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>

### Building(s) Exteriors

11. Outside walls are clean, whether inside or out of the fence.
12. All exterior doors are clean, whether inside or out of the fence.
13. No unnecessary signs.
14. All exterior lights are in good working order.
15. S-K sign is displayed in a proper location for maximum visibility.
16. S-K sign is in good condition, easily legible, clean, and not sun faded.
17. Mail box is clean with proper and clear identification and numbers.
18. No stains or sludge on, in or around the dry dumpster.
19. The dry dumpster is a minimum of 50' from the wet dumpster.

(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>
(2)	0	<u>2</u>

40 + 30  
5

50 + 20 + 3  
1

82220

PAGE POSSIBLE  
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PAGE SUBTOTAL

38	<u>28</u>
-	<u>1</u>
38	<u>28</u>

20. Dry dumpster sits on an impervious surface (concrete, asphalt). (2) 0 2
21. No scrap drums or pails are disposed of in the dumpster. (2) 0 2

II. RETURN AND FILL AREAA. Wet Dumpster

22. Wet dumpster(s) are of S-K approved design. (2) 0 2
23. Wet dumpster's hose connections are in good condition. (2) 0 2
24. No leaks in the dumpsters, valves or hoses. (2) 0 2
25. Outside surface of wet dumpster is free of solvent residue. 2 (0) 0
26. Dumpster lid is closed when not actively dumping drums. (2) 0 2
27. Fusible link mechanism in the lid is properly connected, in good working order, and not painted. (2) 0 2
28. Both lid supports are in proper working condition on each dumpster and properly connected to the fusible link mechanism. (2) 0 2
29. Plastic drum liner bags are hung by two corners to drain. (2) 0 2
30. If bags are disposed of in the dry dumpster, no evidence remains of free solvent in the bags. (2) 0 2

B. Return and Fill Dock Area

31. All walls are free of solvent stains and residue. (2) 0 2
32. Dock area is protected by spill containment. (2) 0 2
33. No standing residue in the catch pans. (2) 0 2
34. All dock area lights in proper working order. 2 (0) 0
35. "No Smoking" signs are posted in the dumpster area. (2) 0 2
36. All dockboards are in good condition and securely attached to the dock. (2) 0 2
37. Fill hoses are in good condition with no visible kinks or cracks. (2) 0 2
38. Nozzles are elevated when not in use. (2) 0 2
39. Drum filling hoses have shutoff valves at the pipe/hose junction that are closed when not in use. (2) 0 2
40. The fill pump is turned "Off" when not in use, and not allowed to time itself off. (2) 0 2
41. All prefilled drums are closed with a lid and ring in place. (2) 0 2
42. No waste drums of sludge, filter bags, or plastic bags are stored on the dock. (2) 0 2
43. No Model 14 containers with dirty solvent are stored on the dock. (2) 0 2
44. Barrel washer is clean and the cover is closed if solvent is stored in the top, or the solvent is drained into another closed reservoir. X 0 1
45. Employees do not work alone handling hazardous materials. 2 (0) 0
46. The ability to summons outside emergency response forces is at the dock. (2) 0 2
47. Shed has drip protectors to prevent splashes from draining to pavement. 2 (0) 0
48. Stairs are provided at the dock for access to and from grade. (2) 0 2
49. All solvent drums are filled on the dock, not on the vehicle. (2) 0 2

PAGE POSSIBLE

60

60

LESS N/A

2

2

PAGE SUBTOTAL

58

58

If there is no fence around the facility, the following apply when not in use:

50. Dumpster lids or dock roll-up doors are closed and locked.
51. Tanks' valves or caps are locked closed (including underground tanks).

### C. Bulk Solvent Storage Area

52. Storage tanks meet secondary containment requirements; or the tanks have been tested or an integrity assessment has been performed within the past 12 months.
53. A copy of the Tank Integrity Assessment or Certification, along with any tank testing results, are available at the facility.

**Above ground storage tanks:**

54. No unrepaired cracks in the concrete of the dikes or containment.
55. No indication of solvent stains or spills in or around the dike.
56. No valves allowing drainage of the dike area.
57. If a spring operated dike drain valve is present, it should be plugged.
58. A stairs or ladder is provided for access over a dike wall of 18" or higher.
59. All tanks display the proper NFPA diamond (MS=0 2 0, Parc=2 0 0, Paint=2 3 1).
60. Waste tanks have a "Hazardous Waste" label applied. (SK #1257)
61. The maximum safe fill level of the tank is on the tank, near gauge, equal to a maximum of 95% full (in gallons and gauge reading).
62. Tanks are clean, free of rust, well painted.
63. A spring loaded fusible link fire valve is installed in inlet and outlet piping close to the MS tanks.
64. The fusible link mechanism and the valve are in good working condition.
65. All tanks have liquid level gauges that are easily readable.
66. All rainwater collected in the dike is tested, approved, and removed within 24 hours of the end of the rain.
67. All tanks have high level alarm systems installed.
68. High level alarm systems are operable and capable of being tested.
69. Solvent pipes are properly labelled and color coded.
70. Tanker fill and empty lines have check valves installed in the proper orientation.

**Underground storage tanks:**

71. All UC tanks have high level alarm systems installed.
72. Alarm systems are operable and capable of being tested on UC tanks.
73. Solvent fill pipe covers are properly labelled and color coded.
74. Fill pipes are back-sealed between the pipe and the soil.

PAGE POSSIBLE	<u>50</u>	<u>50</u>
LESS N/A	<u>12</u>	<u>12</u>
PAGE SUBTOTAL	38	38